
THIRD READING

Bill No: SB 1106
Author: Cabaldon (D)
Introduced: 2/13/26
Vote: 21

SENATE PRIV., DIGITAL TECH. & CONS. PROT. COMMITTEE: 8-0, 4/6/26
AYES: Cabaldon, Gonzalez, McNerney, Ochoa Bogh, Padilla, Reyes, Umberg,
Wiener
NO VOTE RECORDED: Jones

SENATE APPROPRIATIONS COMMITTEE: 5-0, 4/20/26
AYES: Cervantes, Cabaldon, Grayson, Richardson, Wahab
NO VOTE RECORDED: Seyarto, Dahle

SUBJECT: Data brokers

SOURCE: Author

DIGEST: This bill shortens the timelines within which a data broker must comply with various provisions within the Delete Act.

ANALYSIS:

Existing law:

- 1) Requires a business, on or before January 31 following each year in which it meets the definition of a data broker, to register with the Privacy Protection Agency (PPA), as provided. (Civil (Civ.) Code § 1798.99.82.)
- 2) Defines “data broker” as a business that knowingly collects and sells to third parties the personal information of a consumer with whom the business does not have a direct relationship, except as provided. (Civ. Code § 1798.99.80.)
- 3) Requires data brokers to provide, and the PPA to include on its website, the name of the data broker and its primary physical, email, and website addresses,

as well as various other disclosures, including whether the broker collects consumers' precise geolocation or reproductive health care data and whether they collect the personal information of minors. Data brokers may, at their discretion, also provide additional information concerning their data collection practices. (Civ. Code §§ 1798.99.82, 1798.99.84.)

- 4) Subjects a data broker that fails to register as required to administrative fines and costs to be recovered in an administrative action brought by the PPA. (Civ. Code § 1798.99.82.)
- 5) Requires the PPA to establish an accessible deletion mechanism, as provided, that allows consumers, through a single request, to request all data brokers to delete any personal information related to the consumer, as specified. Data brokers are required to access the mechanism every 45 days and process requests for deletion, as specified, within 45 days.
- 6) Provides that in cases where a data broker denies a consumer request to delete because the request cannot be verified, the data broker must process the request as an opt-out of the sale or sharing of the consumer's personal information, as provided for pursuant to the California Consumer Privacy Act (CCPA), within 45 days of receiving the request. (Civ. Code § 1798.99.86.)
- 7) Provides that after a consumer has submitted a deletion request and a data broker has deleted the consumer's data pursuant hereto, the data broker must delete all personal information of the consumer, except as provided, within 45 days beginning August 1, 2026. (Civ. Code § 1798.99.86.)
- 8) Establishes the CCPA, which grants consumers certain rights with regard to their personal information. (Civ. Code § 1798.100 et seq.)
- 9) Provides consumers the right to request that a business delete any personal information about the consumer which the business has collected from the consumer. (Civ. Code § 1798.105(a).)
- 10) Provides a consumer the right, at any time, to direct a business that sells or shares personal information about the consumer to third parties not to sell or share the consumer's personal information. (Civ. Code § 1798.120.)

This bill reduces the above timelines in the Delete Act from 45 days to 30 days.

Background

Data brokers collect and profit from consumers' data without having any direct relationship with the consumers whose information they amass. In order to bring this industry into the light and more fully inform consumers about who is collecting their personal information and how, California established a data broker registry, requiring data brokers to register annually with the California Privacy Protection Agency (CalPrivacy). Data brokers are required to pay a fee and provide certain information about their location, email, and website addresses.

Recent updates have bolstered the law to provide consumers more control over their information. This included a requirement that CalPrivacy create an accessible deletion mechanism that allows consumers, through a single request, to request all data brokers to delete any personal information related to the consumer, as specified. Data brokers are required to access the mechanism every 45 days and process requests for deletion and delete such information within 45 days thereafter. Beginning August 1, 2026, data brokers are required to delete all personal information of such consumers at least once every 45 days, as specified.

This bill again fortifies the law by shortening these time frames from 45 to 30 days. The bill is author sponsored. The California Initiative for Technology and Democracy is in support. No timely opposition has been received.

Comments

To address concerns about the lack of transparency around data brokers' collection of consumer information, AB 1202 (Chau, Chapter 753, Statutes of 2019) established California's data broker registry. The bill was modeled on a Vermont law, Vt. Stat. Ann. tit. 9, §§ 2446 et seq., and requires data brokers to register and pay a registration fee on an annual basis.

The law defines a "data broker" as "a business that knowingly collects and sells to third parties the personal information of a consumer with whom the business does not have a direct relationship." To ensure consistency and to avoid confusion, the statute relies on existing definitions of "personal information," "third party," and "sale" in the CCPA.

Last session, SB 362 (Becker, Chapter 709, Statutes of 2023) bolstered the utility and effectiveness of the data broker registry law in myriad ways and strengthened consumers' right to deletion as to data brokers. Known as the "Delete Act," SB 362 required the creation of an accessible deletion mechanism by CalPrivacy that

allows consumers, through a single request, to request all data brokers to delete any personal information related to the consumer, as specified. CalPrivacy has created that mechanism, which is known as the “Delete Request and Opt-out Platform” or DROP.

Strengthening the Delete Act. Beginning August 1, 2026, a data broker is required to access DROP at least once every 45 days. Within 45 days after receiving a request, data brokers are required to process the deletion request and delete all personal information related to the consumer making the request consistent with the requirements of the Delete Act. In cases where a data broker denies a consumer request to delete because the request cannot be verified, the data broker must process the request as an opt-out of the sale or sharing of the consumer’s personal information, as provided in the CCPA, within 45 days of receiving the request.

Beginning August 1, 2026, after a consumer has submitted a deletion request and a data broker has deleted the consumer’s data, the data broker must delete all personal information of the consumer at least once every 45 days unless the consumer requests otherwise or the deletion is not required.

This bill reduces each of the above 45-day timelines to 30 days, expediting the ability of consumers to have their personal information deleted by data brokers.

According to the author:

California has taken important steps to give consumers the power to delete that data through a centralized deletion mechanism, but current law allows data brokers up to 45 days to act on those requests.

SB 1106 reduces that window to 30 days. When Californians exercise their power to reclaim their personal information, data brokers should act promptly. This bill holds the industry to a standard that puts people first.

FISCAL EFFECT: Appropriation: No Fiscal Com.: Yes Local: No

According to the Senate Appropriations Committee:

The California Privacy Protection Agency (CalPrivacy) anticipates costs associated with updating the DROP platform, rulemaking, and enforcement. Costs to update the Delete Request and Opt-Out Platform (DROP) include content updates, technical implementation, and testing, and are estimated to

be \$100,000 one-time. For rulemaking and enforcement, CalPrivacy expects costs will be absorbable in the near term. However, based on overall compliance with the requirements of the measure enforcement, when data brokers fail to meet their 45 day data download/upload obligations, may require additional resources.

DROP, which is set to be fully operational August 1, 2026, is funded by registration fees deposited annually into the Data Broker Registry Fund. Any changes in programmatic spending may require a commensurate increase in registration fees.

SUPPORT: (Verified 4/20/26)

California Initiative for Technology and Democracy

OPPOSITION: (Verified 4/20/26)

None received

ARGUMENTS IN SUPPORT: The California Initiative for Technology and Democracy writes:

Online disclosure of personal information creates privacy risks for Californians, allowing them to be tracked and targeted with great precision. Moreover, once personal information about an individual is shared or collected, it can be sold and shared among hundreds of data brokers, making a mockery of any sense of privacy we may have. To increase online privacy, California's Delete Request and Opt-Out Platform or DROP, established by SB 362 (Becker), Chap. 709, Stats. 2023, and fully effective in August 2026, allows Californians, through a single request made to CalPrivacy, to opt-out of most online data collection of their personal information. Data brokers are required to delete that information within 45 days of request and then at least once every 45 days thereafter.

SB 1106 shortens the timeframe in which data brokers have to delete personal information, from 45 days of the request to 30 days and then every 30 days thereafter. This shortened deletion period better protects

Californians who choose to use DROP by requiring more timely removal of their personal information. More timely removal means less private information is circulating around the internet to anyone willing to pay for it.

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