

SENATE PRIVACY, DIGITAL TECHNOLOGIES, AND CONSUMER PROTECTION COMMITTEE
Senator Christopher Cabaldon, Chair
2025-2026 Regular Session

SB 923 (Becker)
Version: March 23, 2026
Hearing Date: April 6, 2026
Fiscal: Yes
Urgency: No
CK

SUBJECT

Consumer privacy requests: deletion request records and request submission methods.

DIGEST

This bill expands consumers' right to deletion of their personal information pursuant to the California Consumer Privacy Act (CCPA) and requires specified online businesses to provide consumers an online method for exercising rights under the CCPA.

EXECUTIVE SUMMARY

The CCPA grants consumers certain rights with regard to their personal information, including enhanced notice, access, and disclosure; the right to deletion; and protection from discrimination for exercising these rights. (Civ. Code § 1798.100 et seq.) In the November 3, 2020, election, voters approved Proposition 24, which established the California Privacy Rights Act of 2020 (CPRA). The CPRA amends the CCPA, limits further amendment, and creates the California Privacy Protection Agency ("CalPrivacy"). Relevant here, the CCPA provides a consumer the right, at any time, to request that a business delete any personal information about the consumer which the business has collected *from* the consumer. To provide greater protection, this bill now extends this deletion right to all information a business has about the consumer and updates the appropriate process for complying with such a request.

The CCPA requires businesses to make multiple methods available to consumers for submitting requests pursuant to that law. However, businesses that operate exclusively online are only required to make an email address available for such purposes. This bill additionally requires such online businesses to make another online method, such as a webform or portal available for such purposes. This bill is sponsored by CalPrivacy. It is supported by a number of privacy and consumer advocacy groups, including Kapor Center Advocacy and the California Initiative for Technology & Democracy. It is opposed by a coalition of industry groups, including the Association of National Advertisers.

PROPOSED CHANGES TO THE LAW

Existing law:

- 1) Establishes the CCPA, which grants consumers certain rights with regard to their personal information, including enhanced notice, access, and disclosure; the right to restrict the sale or sharing of information; and protection from discrimination for exercising these rights. It places attendant obligations on businesses to respect those rights. (Civ. Code § 1798.100 et seq.)
- 2) Provides a consumer the right, at any time, to request that a business delete any personal information about the consumer which the business has collected from the consumer, except as specified. Businesses must disclose this right to consumers. (Civ. Code § 1798.105.)
- 3) Requires a business that receives a verifiable consumer request from a consumer to delete the consumer's personal information to delete the consumer's personal information from its records, notify any service providers or contractors to delete the consumer's personal information from their records, and notify all third parties to whom the business has sold or shared the personal information to delete the consumer's personal information unless this proves impossible or involves disproportionate effort. (Civ. Code § 1798.105.)
- 4) Requires businesses to make available to consumers two or more designated methods for submitting requests for information required to be disclosed, or requests for deletion or correction, respectively, including, at a minimum, a toll-free telephone number. A business that operates exclusively online and has a direct relationship with a consumer from whom it collects personal information shall only be required to provide an email address for submitting such requests, as provided. If the business maintains a website, it must make the website available to consumers to submit requests for information required to be disclosed or requests for deletion or correction (Civ. Code § 1798.130(a)(1).)
- 5) Defines "personal information" as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. The CCPA provides a nonexclusive series of categories of information deemed to be personal information, including identifiers, biometric information, and geolocation data. (Civ. Code § 1798.140(v).) The CCPA defines and provides additional protections for sensitive personal information, as defined, that reveals specified personal information about consumers. (Civ. Code § 1798.140(ae).)
- 6) Establishes the CPRA, which amends the CCPA and creates CalPrivacy, which is charged with implementing these privacy laws, promulgating regulations, and

carrying out enforcement actions. (Civ. Code § 798.100 et seq.; Proposition 24 (2020).)

- 7) Permits amendment of the CPRA by a majority vote of each house of the Legislature and the signature of the Governor, provided such amendments are consistent with and further the purpose and intent of this act as set forth therein. (Proposition 24 § 25 (2020).)

This bill:

- 1) Grants consumers the right to request that a business delete any personal information about the consumer which the business has collected.
- 2) Provides that a business that has obtained personal information about a consumer from a source other than the consumer shall be deemed in compliance with a consumer's request to delete that data by retaining a record of the deletion request and the minimum data necessary for the purpose of ensuring the consumer's personal information remains deleted from the business's records and is not being used for any other purpose.
- 3) Requires a business that operates exclusively online and has a direct relationship with a consumer from whom it collects personal information to make an online method, such as a web form or online portal, available for submitting requests.
- 4) States the finding that these changes further the purposes and intent of the CPRA.

COMMENTS

1. California's landmark privacy protection law

As stated, the CCPA grants consumers certain rights with regard to their personal information, as defined. With passage of the CPRA in 2020, the CCPA got an overhaul. Consumers are afforded the right to receive notice from businesses at the point of collection of personal information and the right to access that information at any time. The CCPA also grants a consumer the right to request that a business delete any personal information about the consumer that the business has collected from the consumer. However, a business is not required to comply with such a request to delete if it is necessary for the business to maintain the consumer's personal information in order to carry out certain obligations or other conduct.

A business that receives a verifiable consumer request from a consumer to delete the consumer's personal information must delete the consumer's personal information from its records, notify any service providers or contractors to delete the consumer's personal information from their records, and notify all third parties to whom the business has

sold or shared the personal information to delete the consumer's personal information unless this proves impossible or involves disproportionate effort.

Businesses are also required, pursuant to the CCPA, to make available to consumers two or more designated methods for submitting various requests for information required to be disclosed, or requests for deletion or correction, including, at a minimum, a toll-free telephone number. However, a business that operates exclusively online and has a direct relationship with a consumer from whom it collects personal information is only required to provide an email address for submitting such requests, as provided. If the business maintains a website, it must make the website available to consumers to submit requests for information required to be disclosed or requests for deletion or correction.

2. Fortifying deletion rights for California Consumers

According to the author:

Businesses today routinely augment consumer records with data purchased from third parties to enhance targeting, personalization, and profiling. For example, a retail company might collect basic information directly from the consumer and then purchase detailed demographic data, purchasing histories, and other behavioral information from data brokers to create a rich profile used for marketing and pricing decisions.

The CCPA's current right to deletion targets data a business collects from consumers, but not the full scope of data a company may hold and use to make decisions about individuals. Additionally, it may make businesses more vulnerable to security incidents like data breaches — even after a consumer has taken steps to protect the privacy and security of their information.

Additionally, while most businesses must provide two or more methods to submit privacy requests, online-only businesses that have a direct relationship with the consumer are only required to provide an email address for consumers to submit most privacy requests under the CCPA. This single-method requirement for certain businesses creates barriers for consumers because it offers minimal support or guidance.

Californians should have accessible and frictionless mechanisms to exercise their existing privacy rights, and when they do so, they should feel secure in knowing they've protected themselves from unwanted data retention.

This bill would strengthen consumers' rights under the California Consumer Privacy Act (CCPA) by expanding the right to delete to cover all personal information a business holds about them, and by requiring online businesses to provide consumers with a webform, online portal, or similar method to submit requests to delete their personal information. By expanding the CCPA's right to delete personal information, and by improving how consumers can exercise that right, this bill further empowers Californians to take measures to protect their personal information should they choose.

As stated, the bill extends consumers' deletion rights by extending them to all information collected by a business *about* the consumer, regardless of where it is collected from. Additionally, for businesses operating exclusively online that have a direct relationship with a consumer, the bill now requires they make an online method available.

3. Furthering the purpose and intent of the CPRA

Section 25 of the CPRA requires any amendments thereto to be "consistent with and further the purpose and intent of this act as set forth in Section 3." Section 3 declares that "it is the purpose and intent of the people of the State of California to further protect consumers' rights, including the constitutional right of privacy." It then lays out a series of guiding principles. These include various consumer rights such as:

- consumers should know who is collecting their personal information;
- consumers should have control over how their personal information is used; and
- consumers should benefit from businesses' use of their personal information.

Section 3 also includes a series of responsibilities that businesses should have. These include:

- businesses should specifically and clearly inform consumers about how they use personal information; and
- businesses should only collect consumers' personal information for specific, explicit, and legitimate disclosed purposes.

Section 3 also lays out various guiding principles about how the law should be implemented.

The bill fortifies consumers' existing CCPA rights and provides a pathway for consumers to more effectively exercise their rights thereunder. Therefore, as it explicitly states, this bill "furthers the purposes and intent of the California Privacy Rights Act of 2020."

4. Stakeholder positions

CalPrivacy, the sponsor of the bill, writes:

Extending the right to delete to all personal information held about a consumer provides more meaningful privacy protections and aligns better with consumer intent and expectations. When a consumer submits a request to delete, they should have confidence that all their personal information will be deleted regardless of how the business collected the information.

Additionally, expanding the deletion right would bring the CCPA into alignment with other state privacy laws in the US. This bill follows states like Delaware, Indiana, and Maryland in providing stronger protection by requiring deletion of all personal information collected about the consumer, and allowing businesses to retain the deletion request and only the minimum amount of data necessary to ensure that the consumer's data remains deleted.⁵ This ensures that excess data is not maintained and vulnerable to misuse and breach. This style of deletion right is not novel in California because the Delete Act requires data brokers to delete personal information collected indirectly about consumers.⁶

SB 923 also supports consumers by improving the accessibility of privacy rights under the CCPA. This bill makes it easier for consumers to exercise their rights by requiring online-only businesses to offer multiple methods to submit privacy requests, rather than only requiring an email address. Alternative methods, like webforms, can offer consumers the support and guidance needed to make it easier to submit a request regardless of technical ability or legal expertise. They also increase efficiency by ensuring that necessary information is provided to the business at the start. Privacy rights are more effective when consumers can exercise them with less friction and uncertainty.

Writing in support, TechEquity Action explains the need for the bill:

Current law requires businesses to delete personal information they have collected "from" a consumer. Privacy attorneys have noted that this creates a loophole: businesses and data brokers can decline deletion requests by claiming they obtained the data from a third-party source rather than directly from the consumer. Businesses build detailed profiles with this personal data, which can be deployed for surveillance pricing or packaged and sold to predatory marketers who target people with high-interest loans, gambling products, or with spam and scams. SB 923 closes this loophole by expanding the deletion right to cover data collected

“from or about” a consumer; it ensures the right to delete reflects how data is actually collected and used today.

Closing this loophole in the right to delete is of limited use if it’s hard to exercise that right. The Delete Act was a meaningful step forward, giving consumers an easy way to request that registered data brokers delete their personal data. SB 923 builds on that progress by requiring online-only businesses to offer a simple web form or portal for privacy requests, rather than just an email address. This matters; reducing the friction can mean the difference between a right that exists on paper and one that people actually use and appreciate.

A coalition of industry groups, including Technet, write in opposition:

[T]he bill fails to recognize that a business should also be deemed in compliance with a consumer’s request to delete their data by opting the consumer out of processing for non-exempt purposes, in addition to retaining the minimum data necessary to honor the deletion request.

While the exemptions under Civil Code Sec. 1798.150 presumably apply, explicitly including this language provides clarity, particularly when this bill appears modeled upon other states like Virginia that have expressly adopted both limitations upon the right of deletion. From an operational and legal perspective, this language is essential to prevent confusion, to ensure technical scalability, and to allow businesses to fulfill obligations related to fraud prevention, security monitoring, and legal compliance.

SUPPORT

CalPrivacy (sponsor)

California Initiative for Technology & Democracy, a Project of California Common CAUSE

Consumer Reports

Electronic Frontier Foundation

Electronic Privacy Information Center

Kapor Center Advocacy

Oakland Privacy

Privacy Defense Alliance

Privacy Rights Clearinghouse

TechEquity Action

OPPOSITION

Association of National Advertisers

California Chamber of Commerce
California Restaurant Association
Civil Justice Association of California (CJAC)
Computer & Communications Industry Association
Insights Association
Silicon Valley Leadership Group
Software Information Industry Association
Technet

RELATED LEGISLATION

AB 566 (Lowenthal, Ch. 465, Stats. 2025) requires browsers to include functionality configurable by a consumer that enables the browser to send an opt-out preference signal to a business with which a consumer interacts through the browser.

AB 656 (Schiavo, Ch. 464, Stats. 2025) requires large social media platforms to provide users with a clear and accessible mechanism for deleting their accounts and associated personal information.

SB 362 (Becker, Ch. 709, Stats. 2023) established the Delete Act, which bolstered the data broker registry law by, in part, requiring more information to be reported and transferring much of the relevant duties from the Attorney General to CalPrivacy. It also expanded consumers' deletion rights and requires CalPrivacy to create an accessible deletion mechanism that allows a consumer, through a single request, to request that every data broker delete the personal information related to the consumer and held by the data broker, except as specified. To ensure consumers can meaningfully exercise their rights under the law, given the hundreds of data brokers on the registry, the mechanism is required to support the ability of a consumer's authorized agent to aid in the deletion request.
