
SENATE COMMITTEE ON APPROPRIATIONS

Senator Sabrina Cervantes, Chair
2025 - 2026 Regular Session

SB 923 (Becker) - Consumer privacy requests: deletion request records and request submission methods

Version: March 23, 2026

Urgency: No

Hearing Date: April 20, 2026

Policy Vote: P., D.T., & C.P. 7 - 0

Mandate: No

Consultant: Bob Franzoia

Bill Summary: SB 923 would require online businesses to make a second online method available for consumers to submit data deletion requests and would expand the personal data subject to deletion requests pursuant to the California Consumer Privacy Act (CCPA).

Fiscal Impact: The California Privacy Protection Agency (CalPrivacy) anticipates minor near term implementation and enforcement costs. CalPrivacy is responsible for enacting and enforcing the CCPA and promoting public awareness of consumers' privacy rights and businesses' obligations. Based on overall compliance with the requirements of this bill, additional resources for enforcement may be required in future years.

The Consumer Protection Section within the Public Rights Division of the Department of Justice (DOJ) anticipates increased workload to investigate and prosecute violations of this bill's expanded consumer deletion rights and new online request requirements as well as provide technical support to review compliance with these new requirements.

Background: Businesses that are subject to the CCPA have several responsibilities, including responding to consumer requests to exercise privacy rights and to give consumers certain notices explaining their privacy practices. The CCPA applies to many businesses, including data brokers. A data broker is a company with the primary purpose of collecting personal information about consumers, aggregating and analyzing the information, and selling the personal information or data gleaned from it to third parties. In this situation, the consumer is not personally involved in any transaction – instead, a consumer leaves a trail of their personal information like GPS coordinates, social media likes and views, and search information as the consumer visits websites and uses applications. A data broker purchases that personal information and sells it to other companies that use it for marketing, fraud detection, and other services.

California's Data Broker Registration Law requires qualifying data brokers to register with the DOJ and provide certain identifying information each year. There are approximately 500 data brokers registered in California. Under existing law, a consumer who wants registered data brokers to delete the consumer's personal information must separately select each broker listed on DOJ's website, click through to each data broker's website, and request that each broker delete certain personal information it maintains.

The existing right to delete under the CPPA only requires deletion of personal information collected from the consumer and therefore does not address the full scope

of personal information held and used by a business to make decisions about the individual.

Staff Comments: CalPrivacy and the DOJ share enforcement of the CCPA with funding from the Consumer Privacy Fund (General Fund). Each agency receives complaints from consumers and has separate complaint enforcement processes. Funds from CalPrivacy enforcement actions are deposited in the Consumer Privacy Subfund and used exclusively by CalPrivacy in carrying out its duties under the CCPA. Funds from DOJ enforcement actions are deposited in the Attorney General Consumer Privacy Enforcement Subfund and used exclusively by the Attorney General in carrying out its duties under the CCPA.

CalPrivacy enforces the Delete Act and the CCPA. Both laws require CalPrivacy to follow the California Administrative Procedure Act (APA). CalPrivacy accepts complaints regarding potential violations of the CCPA through its complaint portal. Where an online business fails to make available the second method of data deletion, a consumer could file a complaint.

Presently, the volume of potential investigations exceeds CalPrivacy resources. When CalPrivacy conducts investigations, it gathers facts across multiple aspects of the law, often across dozens of CCPA provisions. Violations rarely exist in isolation, often occurring in multiple places. Thus, expanding a definition or broadening the CCPA might result in additional questions during an investigation, but probably will not cause a measurable increase in short-term workload given that there is large backlog of potential investigations. CalPrivacy notes the vast majority of cases settle before formal enforcement action is taken.

In the first fiscal year of CalPrivacy's complaint portal (7/2023 – 6/2024), it received approximately 2,200 complaints from consumers about all violations of the CCPA. Over the following fiscal year (7/2024 – 6/2025), the number of new complaints more than doubled to approximately 4,900, reflecting a 125 percent increase. CalPrivacy estimates it is on track to exceed last year's numbers again.