

THIRD READING

Bill No: SB 923
Author: Becker (D)
Amended: 3/23/26
Vote: 21

SENATE PRIV., DIGITAL TECH. & CONS. PROT. COMMITTEE: 7-0, 4/6/26
AYES: Cabaldon, Gonzalez, McNerney, Padilla, Reyes, Umberg, Wiener
NO VOTE RECORDED: Jones, Ochoa Bogh

SENATE APPROPRIATIONS COMMITTEE: 5-0, 5/14/26
AYES: Cervantes, Cabaldon, Grayson, Richardson, Wahab
NO VOTE RECORDED: Seyarto, Dahle

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

SOURCE: CalPrivacy

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.

ANALYSIS:

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. (Civil (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 the California Privacy Protection Agency (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.

Background

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.

Comments

The CCPA 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.

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, this 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, this bill now requires they make an online method available.

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

According to the Senate Appropriations Committee:

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.

SUPPORT: (Verified 5/14/26)

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: (Verified 5/14/26)

Association of National Advertisers

California Chamber of Commerce

California Restaurant Association

Civil Justice Association of California

Computer & Communications Industry Association

Insights Association

Silicon Valley Leadership Group

Software Information Industry Association

Technet

ARGUMENTS IN SUPPORT: CalPrivacy, the sponsor of this 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. 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.

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.

ARGUMENTS IN OPPOSITION: A coalition of industry groups, including Technet, writes:

[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.

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