



Financial Services Technology

Simplicity by Compliance Systems™

Simplicity Configuration Job Aid Updating Privacy Policy Data Set for CCPA

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About This Training Guide

This document is intended to serve as a job aid that guides Simplicity users through the steps required to update their Privacy Policy data set for the new July 2020 CCPA changes.

Simplicity Document Library

2020.185.0

What You Need to Know

The California Consumer Privacy Act went into effect January 1, 2020 and applies to institutions if they do business in California and if they collect the personal information of California residents that fall outside of the Gramm-Leach-Bliley Act, or GLBA. The CCPA requires institutions that are subject to the CCPA to determine what kind of personal information they collect and ensure that they can track when the personal information is collected to comply with a 12-month lookback requirement.

Previously in January 2020, Compliance Systems implemented the previous required CCPA data changes within our existing GLBA Privacy Policy. All CCPA-related data currently renders in the “Other Important Information” section of the Privacy Policy.

To comply with the recent California Attorney General's implementing regulations to the CCPA, Compliance Systems has made additional data collection changes and added new Privacy documents, which are outlined below. If your institution does business in California and collects personal information of California residents, you'll need to log into Simplicity Configuration to address the data collection changes that have been made to the Privacy data set workflow. Please note that this step is necessary even if you've already indicated that your institution is subject to the CCPA in your Privacy Policy data set based on the updates that were released in January of 2020.

However, if your financial institution had previously indicated that you were not subject to the CCPA, then additional action is not required.

New Documents

Regulation P is one of the strictest regulations when it comes to what data can be disclosed and the number of pages included on the federal Privacy Policy. For this reason, if a financial institution is subject to the CCPA, Compliance Systems has added two stand-alone documents that can be returned in lieu of including required CCPA data in the “Other important information” section of the standard GLBA Privacy notice.

These two new documents are the California Consumer Privacy Act Privacy Policy and the Notice at Collection of Personal Information and are selected based on the data collection in the Privacy data set workflow.

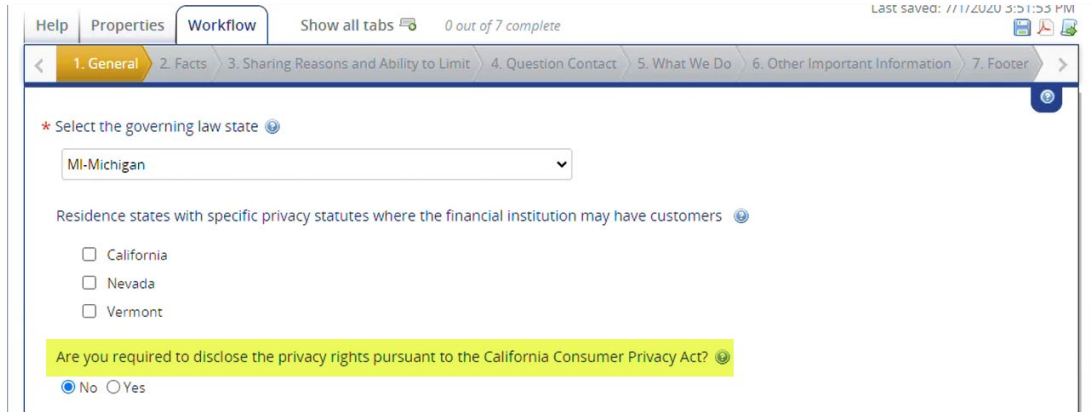
The California Consumer Privacy Act Privacy Policy renders the required disclosures of the CCPA's privacy policy notice as required by the regulations but does so separately from the GLBA Privacy Policy. The California Consumer Privacy Act Privacy Policy is unique in that it discloses information related to the types of personal information that your institution *has* collected within the last 12 months in addition to all the categories of personal information that your financial institution *can* collect (this is only true if the institution select to not return the Notice at Collection otherwise it will be in the Notice at Collection document).

The other new Privacy disclosure that has been made available with this update is the Notice at Collection of Personal Information. The information included on this document needs to be disclosed to customers at or prior to collection of any personal information from a natural person and can be used in commercial or consumer transactions for deposit and lending lines of business. If you choose not to provide this information as a stand-alone document, the data is included in the California Consumer Privacy Act Privacy Policy under the heading “Notice at Collection.”

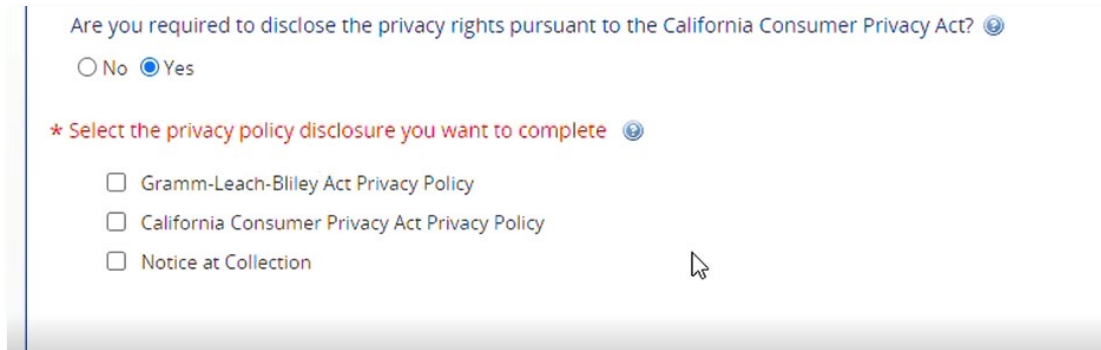
Updating the Privacy Policy Data Set

Procedure

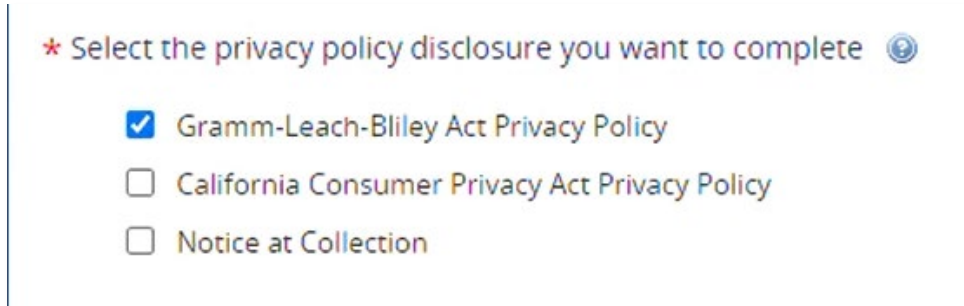
- 1- On the *General* tab, navigate to the data element “Are you required to disclose the privacy rights pursuant to the California Consumer Privacy Act?” and select Yes or No. If you’re not sure whether that applies to your organization, you can click the help icon next to the data element to see the requirements.



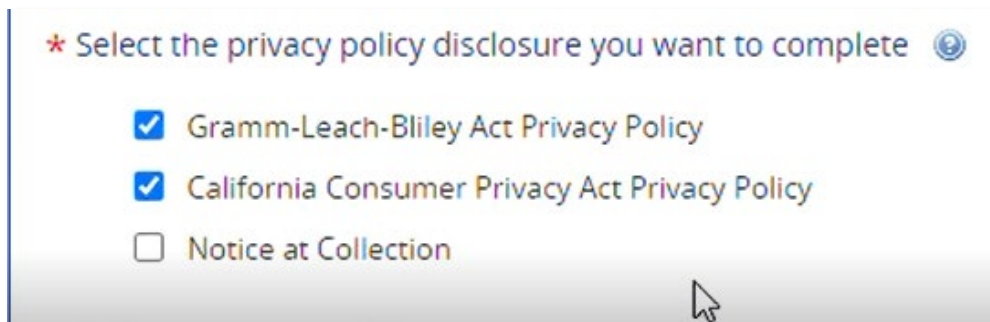
- 2- Selecting “Yes” to this data element will prompt a new required data element, which allows you to select the privacy policy disclosures you wish to complete.



- 3- If you are licensed for Consumer deposit or lending, you will need to be sure to select the GLBA Privacy Policy in addition to the California Consumer Privacy Act Privacy Policy and/or the Notice at Collection of Personal Information.



- 4- In order to return the California Consumer Privacy Act Privacy Policy, select California Consumer Privacy Act Privacy Policy from the list of available privacy disclosures.



** Note: If you choose **not** to select the Notice at Collection of Personal Information in addition to the California Consumer Privacy Act Privacy Policy from the available check boxes on the General tab, there will be a Notice at Collection section included in the State Privacy Policy to ensure that all required privacy information is disclosed. If you **do** select the Notice at Collection of Personal Information from the list of available documents on the General tab, that section will **not** populate on the California Consumer Privacy Act Privacy Policy because it will be captured and disclosed separately on the Notice at Collection of Personal Information document.**

- 5- A California Consumer Privacy Act Privacy Policy tab will populate with required and optional data elements that need to be reviewed and completed.



- 6- Once you've completed all required and applicable optional data elements, you can preview your data set using the preview icon in the upper right corner of the screen.


Policies >> Privacy

CCPA Privacy Test- KS


Help Properties Workflow Show tab bar 9 out of 11 complete


1. General 2. Facts 3. Sharing Reasons and Ability to Limit 4. To Limit Our Sharing 5. Question Contact 6. Mail In Form


10. California Consumer Privacy Act Privacy Policy 11. Notice at Collection

* Do you sell a consumer's personal information to third parties for monetary value? 


No Yes


* + Categories of personal information collected 


(No value selected) 


* Business or commercial purpose for which the categories of personal information will be used 


B I U

* + Categories of personal information collected within the preceding 12 months 


(No value selected) 


* + Categories of sources 


(No value selected) 

* Business or commercial purpose for collecting or selling personal information 


B I U

* + Request to delete personal information method type 


(No value selected) 

Instructions for authorized agents 


B I U

Do you buy, receive for commercial purposes, sell, or share for commercial purposes personal information of 10,000,000 or more consumers in a calendar year? 

No Yes

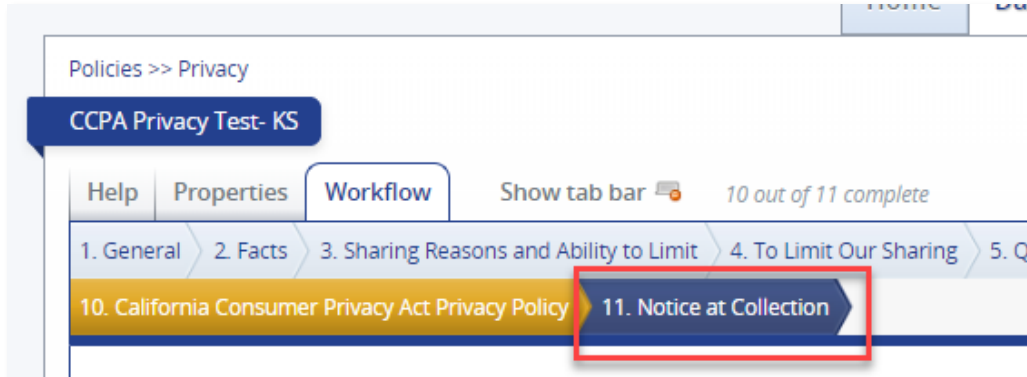
* + Contact method for questions or concerns 

B I U

Additional California Consumer Privacy Act statement 

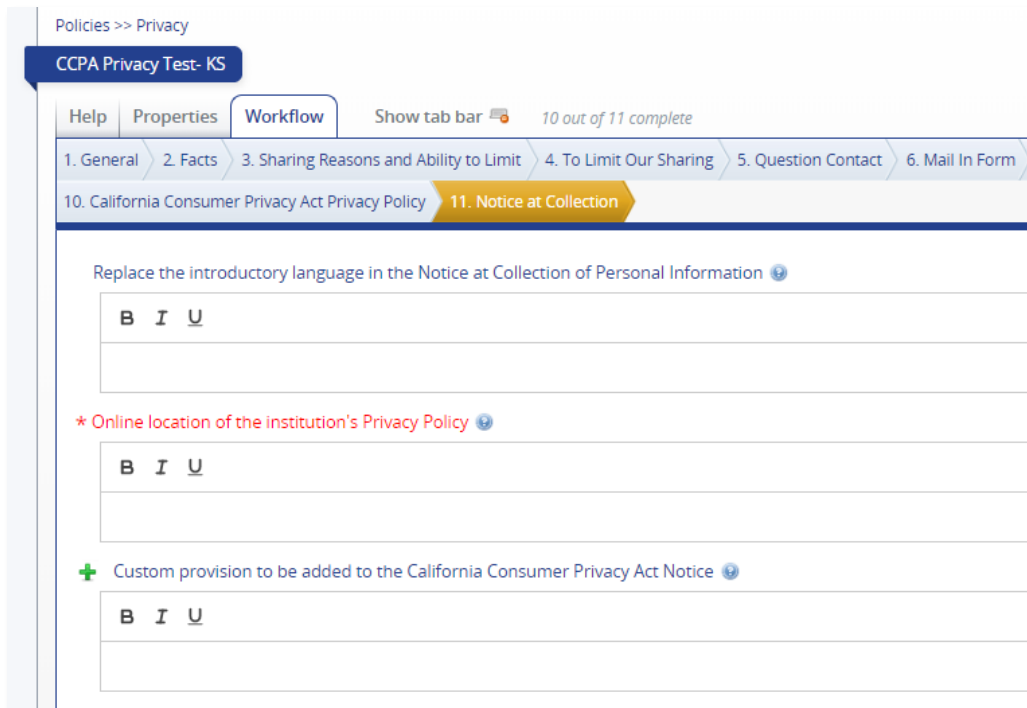
B I U

- 7- In order to return the Notice at Collection of Personal Information as a stand-alone document, select that document from the General tab on the Privacy data set. That selection will prompt a Notice at Collection tab featuring required and optional data elements that need to be reviewed and completed if necessary.



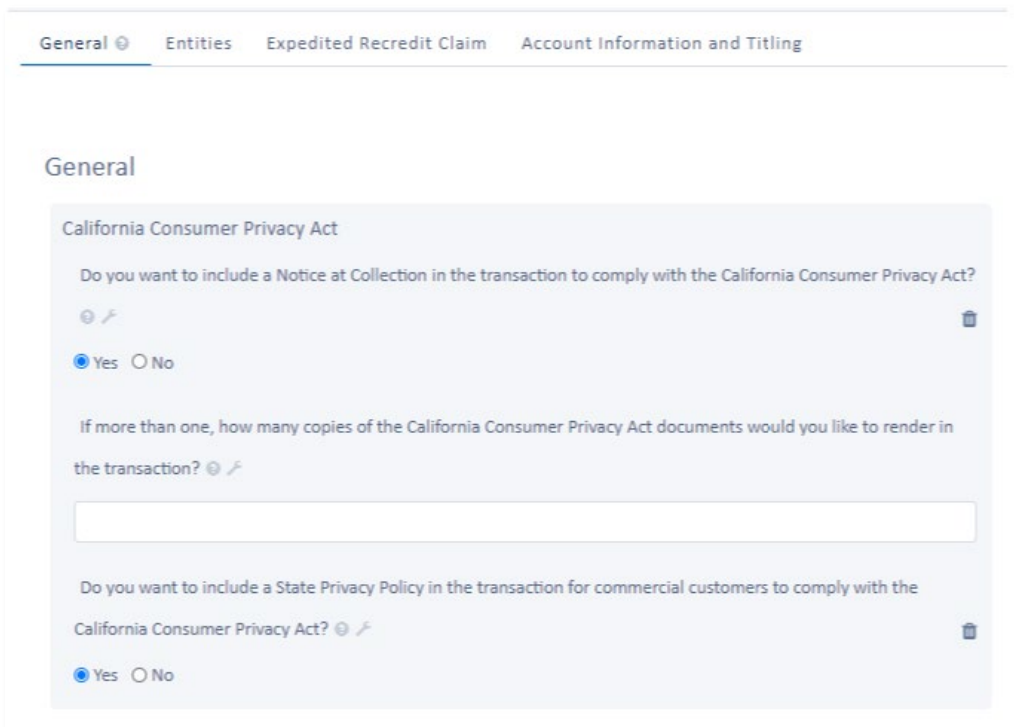
Note: If an institution sells a consumer's personal information then the required data to complete the Notice of Right to Opt Out of Personal Information **will render on this workflow. If Notice at Collection is **not** selected, the Notice of Right to Opt Out of Personal Information will be completed via the California Consumer Privacy Act Privacy Policy workflow under the heading "Notice of Right to Opt Out of Sale of Personal Information."

- 8- Once the data set has been completed, you can preview it by selecting the preview icon in the top right corner of the data set.



Impacts to Simplicity Runtime

- 1- If you are a user of Simplicity Runtime and you have selected to the return the California Consumer Privacy Act Privacy Policy document and/or the Notice at Collection of Personal Information document, a California Consumer Privacy Act section will populate on the General tab in Simplicity Runtime.



The screenshot shows the 'General' tab in the Simplicity Runtime interface. The 'California Consumer Privacy Act' section is active, displaying three settings:

- Do you want to include a Notice at Collection in the transaction to comply with the California Consumer Privacy Act?** (Yes selected)
- If more than one, how many copies of the California Consumer Privacy Act documents would you like to render in the transaction?** (Input field)
- Do you want to include a State Privacy Policy in the transaction for commercial customers to comply with the California Consumer Privacy Act?** (Yes selected)

- 2- This allows you to select whether you want to include the Notice at Collection at the time of the current transaction, determine how many copies of the California Consumer Privacy Act documents you'd like to render in the transaction, and whether you want to include a California Consumer Privacy Act Privacy Policy in the transaction for commercial customers.
- 3- These fields can be defaulted in the Deposit Runtime Defaults and Lending Common Settings data set workflows in Simplicity Configuration and are dependent on proper configuration of your Selection Groups.