



Financial Services Technology

Simplicity Configuration

California Consumer Privacy Act Privacy Policy and Notice at Collection

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About This Training Guide

This document is intended to serve as a guide for creating your **Privacy Policy** data set for financial institutions if they must comply with the California Consumer Privacy Act, or CCPA.

The California Consumer Privacy Rights Act, or CPRA, requires institutions that are subject to the California Consumer Privacy Act, or CCPA, to determine what kind of consumer personal information they collect—or, in some instances, sell, share, or disclose—and ensure that they can track this personal information to comply with a twelve-month look-back requirement.

The **California Consumer Privacy Act Privacy Policy** document, or **CCPA Privacy Policy**, discloses the required regulatory content of the CCPA and CPRA, as well as the implementing regulations, but does so separately from the **Gramm-Leach-Bliley Act 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 institution *can* collect.

The other privacy disclosure that has been made available is the **Notice at Collection**. The information included on this document needs to be disclosed to customers at or prior to the 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.

Any data or disclosure content that is not mentioned in this training guide is either not new or has not been changed since our previous update of the **CCPA Privacy Policy**. As a result, some Simplicity Configuration tabs have more data on them that must be completed than is discussed in this document.

Document Conventions

You may see the following throughout this training guide.

Deeper Look



The information supplied in a deeper look box provides supplemental information. The tips and insight given here will not be critical to the objectives of the document but are intended to provide a more thorough understanding of the solution.

Critical




Information contained in a critical box is something you must be aware of to ensure success using the solution.

General Tab


The **General** tab collects broad data for your financial institution's privacy policy. The answers you provide to questions on this tab may drive additional data collection and will determine if other tabs are included in this workflow. This guide focuses on the California-specific questions.

The CCPA and the CPRA-specific data becomes available when you answer *Yes* to [Are you required to disclose the privacy rights pursuant to the California Consumer Privacy Act](#). The help icon provides a more detailed description of who the CCPA applies to.

Are you required to disclose the privacy rights pursuant to the California Consumer Privacy Act? 

☐ No ☒ Yes

When you answer *Yes* to [Are you required to disclose the privacy rights pursuant to the California Consumer Privacy Act](#), you must answer [Select the privacy policy disclosure\(s\) you want to complete](#). You may choose to return a **California Consumer Privacy Act Privacy Policy** document and a **Notice at Collection** document to comply with the CCPA and CPRA.

* Select the privacy policy disclosure(s) you want to complete 

☐ Gramm-Leach-Bliley Act Privacy Policy

☐ California Consumer Privacy Act Privacy Policy

☐ Notice at Collection

Previously, if the **Notice at Collection** document was not selected as a privacy disclosure to be completed, then information from this document displayed on the **CCPA Privacy Policy**. After January 1, 2023, this information only renders on the **Notice at Collection** document when it is selected as a document to be completed and will no longer render as part of the **CCPA Privacy Policy**.



If you are licensed for Consumer deposit or lending, you **must** select the **GLBA Privacy Policy** in addition to the **California Consumer Privacy Act Privacy Policy** and/or the **Notice at Collection**.

The remaining questions on the **General** tab control the data that is displayed on up to six additional sections in the **CCPA Privacy Policy**. Those sections are:

- (1) Your Rights Regarding Your Personal Information
- (2) Types of Personal Information
- (3) Notices
- (4) How to Submit a Request Regarding Your Personal Information
- (5) Information About Requests We Receive
- (6) Contact Information

These sections correspond with data collection tabs in the workflow. Depending on the answers you provide for the questions on the **General** tab, you may not encounter each of these tabs. Previously, this data was collected on a single tab in the workflow.

Consumer Rights Regarding Their Personal Information

The **Consumer Rights Regarding Their Personal Information** tab is displayed in the workflow when you answer Yes to *Have you sold or shared a consumer's personal information to third parties in the preceding 12 months* on the **General** tab.

8. Consumer Rights Regarding Their Personal Information

This tab captures data for the **Your Rights Regarding Your Personal Information** section, **Right to Opt-Out** subsection of the **CCPA Privacy Policy**.

Your Rights Regarding Your Personal Information

(1) **Right to Know.** You have the right to know the personal information that we collect, use, and sell or share about you, including the categories of personal information; the categories of sources from which the personal information is collected; the business or businesses for which we collect, use, and sell or share your personal information; and the third parties to whom we have sold or shared your personal information.

(4) **Right to Opt-Out.** We sell your personal information to third parties, but you have the right to opt-out of the sale or sharing of your personal information at any time. If you are 16 years or older, you may direct us not to sell or share your personal information to third parties at any time. If you are at least 13 years old but less than 16 years old, we will not sell or share your personal information to third parties without your affirmative consent.

If you answer Yes to *Do you process opt-out preference signals in a frictionless manner*, it means that your institution will not charge a fee or require any valuable consideration if a customer uses an opt-out preference signal; your institution will not change their experience with the product or service that is offered regardless if they use an opt-out preference signal or not; and your institution will not display a notification, pop-up, text, graphic, animation, sound, or video in response to the opt-out preference signal.


* Do you process opt-out preference signals in a frictionless manner? ⓘ

☐ No ☒ Yes

The descriptions that you provide for *Consumer process for opt-out preference signals in a frictionless manner* are displayed at the end of the **Right to Opt-Out** section.

* Consumer process for opt-out preference signals in frictionless manner description ⓘ

B I U

Sample Signal 

Preview

Right to Opt-Out. We sell your personal information to third parties, but you have the right to opt-out of the sale or sharing of your personal information at any time. If you are 16 years or older, you may direct us not to sell or share your personal information to third parties at any time. If you are at least 13 years old but less than 16 years old, we will not sell or share your personal information unless we receive the consent from your parent or guardian.

(4) We will process your opt-out preference signal and you can use the opt out-preference signal Opt-Out Button For purposes of this section, an opt-out preference signal is a signal that is sent by our platform, technology, or mechanism on your behalf that automatically communicates your choice to opt-out of the sale or sharing of your personal information.

We process your opt-out preference signals in a frictionless manner. A frictionless manner means that we will not charge a fee or require any valuable consideration if you use an opt-out preference signal; we will not change your experience with the product or service that is offered regardless if you use an opt-out preference signal or not; and we will not display a notification, pop-up, text, graphic, animation, sound, or video in response to the opt-out preference signal. You can implement opt-out preference signals so that we process your preference in a frictionless manner. **Sample Signal**

Collected Personal Information

The **Collected Personal Information** tab is always displayed in the workflow and provides options to identify the types of personal information that your financial institution collects.

9. Collected Personal Information

Collected Personal Information

Types of Personal Information

Categories of Personal Information. We collected the following categories of personal information in the preceding 12 months:

- Identifiers, such as name and federal or state issued identification numbers including Social Security number, driver's

The questions that appear on this tab include options that you can select from pre-populated lists. You can select multiple items from the list for each question. When you select a response, the question appears again so you can optionally select additional responses.

* + 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 personal information in the preceding 12 months ⓘ

(No value selected) ▼



The available responses to *Categories of personal information collected within the preceding 12 months* and *Business or commercial purpose for collecting personal information in the preceding 12 months* are documented in the [Appendix](#).

Selling/Sharing Personal Information

The **Selling/Sharing Personal Information** tab is displayed in the workflow when you answer *Yes* to *Have you sold or shared a consumer's personal information to third parties in the preceding 12 months* on the **General** tab.

★ Have you sold or shared a consumer's personal information to third parties in the preceding 12 months? ⓘ

☐ No ☒ Yes

This tab captures data for the **Types of Personal Information** section, **Sold or Shared Personal Information** subsection of the **CCPA Privacy Policy**.

10. Selling/Sharing Personal Information

Sold or Shared Personal Information
Categories of Personal Information. We sold or shared with third parties the following categories of personal information in the preceding 12 months:

Identifiers such as name and federal or state issued identification numbers including Social Security number, driver's

If you answer *Yes* to *Do you sell or share personal information to consumers less than 16 years of age*, you can supply text for the question *Describe the reasonable process or method when personal information of consumers less than 16 years of age*. Data supplied for this question renders at the end of the **Personal Information of Consumers Less Than 16 Years Old** section in the **CCPA Privacy Policy**.

Do you sell or share personal information of consumers less than 16 years of age? ⓘ

☐ No ☒ Yes

Describe the reasonable process or method when personal information of consumers less than 16 years old is sold or shared ⓘ

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For each *Category of personal information sold or shared type*, you are required to provide a response to the *Category of third parties to whom personal information was sold*. When you select a response, the question appears again so you can optionally select additional responses.

Categories of personal information sold or shared type ⓘ

Categories of personal information sold or shared type ⓘ

Any information that identifies, relates to, describes, or is capable of identifying a consumer ⓘ

★ + Categories of third parties to whom personal information was sold or shared ⓘ

(No value selected) ⓘ



The available responses to *Business or commercial purpose for selling or sharing personal information in the preceding 12 months* and *Categories of personal information sold or shared* are documented in the [Appendix](#).

Disclosed Personal Information

The **Disclosed Personal Information** tab is displayed in the workflow when you answer *Yes* to *Have you disclosed consumers' personal information to third parties for a business purpose in the preceding 12 months* on the **General** tab.

* Have you disclosed consumers' personal information to third parties for a business purpose in the preceding 12 months? ⓘ

☐ No ☒ Yes

This tab captures data for the **Types of Personal Information** section, **Disclosed Personal Information** subsection of the **CCPA Privacy Policy**.

11. Disclosed Personal Information

Disclosed Personal Information
Categories of Personal Information. We disclosed the following categories of personal information to third parties in the preceding 12 months:

For each *Category of personal information disclosed type*, you are required to provide a response to the question *Category of third parties to whom personal information was disclosed for a business purpose*. When you select a response, the question appears again so you can optionally select additional responses.

Categories of personal information disclosed type ⓘ

Categories of personal information disclosed type ⓘ

Identifiers such as a real name, alias, postal address, unique perso ▼

* + Categories of third parties to whom personal information was disclosed for a business purpose ⓘ

(No value selected) ▼



The available responses to *Business or commercial purpose for disclosing personal information in the preceding 12 months* and *Categories of personal information disclosed* are documented in the [Appendix](#).

Notices

The **Notices** tab is displayed in the workflow when you answer *Yes* to either of the following questions on the **General** tab:

- *Have you sold or shared a consumer's personal information to third parties in the preceding 12 months?*
- *Do you use or disclose sensitive personal information for purposes other than those permitted by law?*

* Have you sold or shared a consumer's personal information to third parties in the preceding 12 months? ⓘ

☐ No ☒ Yes

* Do you use or disclose sensitive personal information for purposes other than those permitted by law? ⓘ

☐ No ☒ Yes

This tab captures data for the **Notices** section, **Notice of Right to Opt-Out of Sale/Sharing** or the **Notice of Right to Limit** subsections of the **CCPA Privacy Policy**.

12. Notices

Specifically, the **Notice of Right to Opt-Out of Sale/Sharing** section renders if you answer *Yes* to *Have you sold or shared a consumer's personal information to third parties in the preceding 12 months*.

Notices

Notice of Right to Opt-Out of Sale/Sharing

If we sell or share your personal information, we are required to provide you with a Notice of Right to Opt-Out of Sale/Sharing informing you of your right to direct us to stop selling or sharing your personal information and to provide you with the

If you supply a response for the question *Website to opt-out of sale of personal information*, you are required to provide one *Opt-out method type*. If you do not supply a response for the question *Website to opt-out of sale of personal information*, you are required to provide two opt-out method types. This also applies to the request to limit questions.

Website to opt-out of sale of personal information ⓘ

* + Opt-out method type ⓘ

(No value selected) ▼

The **Notice of Right to Limit** section renders if you answer *Yes* to *Do you use or disclose sensitive personal information for purposes other than those permitted by law*.

Notice of Right to Limit If we collect, use, or disclose your sensitive personal information for purposes other than those permitted by California law, we are required to provide you with a Notice of Right to Limit informing you of your right to limit

Consumer Request to Know, Delete, and Correct

The **Consumer Requests to Know, Delete, and Correct** tab is always displayed in the workflow and captures data for the **How to Submit a Request Regarding Your Personal Information** section of the **CCPA Privacy Policy**.

13. Consumer Requests to Know, Delete, and Correct

How to Submit A Request Regarding Your Personal Information
You can submit a verifiable request to know, request to delete, or request to correct your personal information to us. We will verify that you are the person who we have collected information about by CCPA Request to Know Process. No later than 10 business days after receiving your request(s), we will confirm that we received your request(s) and provide you with information.

You are required to supply a response for *Instructions for authorized agents* with the text box provided. Data supplied for this question renders at the end of the **Authorized Agents** section in the **CCPA Privacy Policy**.

★ Instructions for authorized agents ⓘ

B **I** **U**

SAMPLE

Ⓢ

Preview

How to Submit A Request Regarding Your Personal Information

You can submit to us a verifiable request to know, request to delete, or request to collect your personal information. We will verify that you are the person who we have collected information about by Sample. No later than 10 business days after receiving your request(s), we will confirm that we received your request(s) and provide you with information on how we will process your request(s). We will respond to your request to know, request to delete, or correct no later than 45 calendar days after receiving your request(s). If we cannot verify your identity within this time period, we may deny your request(s). If we need more time, we will inform you of the reason for the delay during this time period and may extend the time to respond up to an additional 45 calendar days. Our response will cover the 12-month period preceding our receipt of your request.

You can submit your request to know delete, request to delete, and request to correct by calling us toll-free at 555-555-5555. You can also submit your request(s) by using any of the following methods:

- Visiting our online form at: website.com

Authorized Agents. We may allow an authorized agent to make a request to know, request to delete, or request to correct on your behalf. We may require written proof that you have given the agent permission to submit a request on your behalf, require the agent to verify their identity with us, or require you to confirm with us that you have provided the agent permission to submit the request. If you are an authorized agent, you may make these requests by following these instructions: **SAMPLE**

Information About Requests

The **Information About Requests** tab is displayed in the workflow when you answer Yes to *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* on the **General** tab.

* 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

This tab captures data for the **Information About Requests We Receive** section of the **CCPA Privacy Policy**.

14. Information About Requests

Information About Requests We Receive

We, alone or in combination, buy, receive for a commercial purpose, sell, share, or otherwise make available for commercial purposes the personal information of 10,000,000 or more consumers in a calendar year. In the previous year:

If you answer Yes to *Do you use our mobile-enabled online account opening solution*, you must provide an answer to *Do you have the metrics from the previous calendar year on your website and want to provide a link to this information*.

* Do you use our mobile-enabled online account opening solution? ⓘ

☐ No ☒ Yes

* Do you have the metrics from the previous calendar year on your website and want to provide a link to this information? ⓘ

☐ No ☒ Yes

* Website link for metrics from previous calendar year ⓘ

B I U

If you answer No to *Do you use our mobile-enabled online account opening solution*, or if you answer No to *Do you have the metrics from the previous calendar year on your website and want to provide a link to this information*, then you must answer additional questions.

* Number of requests to know that were received and complied with in the previous calendar year ⓘ

B I U

* Number of denied requests to know personal information in the previous calendar year ⓘ

Contact Information

The **Contact Information** tab is always displayed in the workflow and captures data for the **Contact Information** section of the **CCPA Privacy Policy**.

15. Contact Information

Contact Information
For more information about our privacy policy and practices regarding our Information Practices, you can contact us by

This tab provides contact information that consumers can use to ask questions or raise concerns about your institution's privacy policies and information practices.

* Contact description for questions or concerns ⓘ

B I U

Notice at Collection

The **Notice at Collection** tab is displayed in the workflow when you select *Notice at Collection* as a response to the question *Select the privacy policy disclosure(s) you want to complete* on the **General** tab. Only an institution that controls the collection of a consumer's personal information from a consumer must provide a **Notice at Collection** at or before the point of collection.

* Select the privacy policy disclosure(s) you want to complete ⓘ

☐ Gramm-Leach-Bliley Act Privacy Policy

☐ California Consumer Privacy Act Privacy Policy

☒ Notice at Collection

This tab captures data for the **Notices at Collection** document. That data includes the categories of personal information to be collected from consumers, the purposes for which their personal information is collected or used, and whether that information is sold or shared.

16. Notice at Collection

NOTICE AT COLLECTION

We are required to provide California residents with timely notice, at or before the point of collection, about the categories of personal information to be collected from you, the purposes for which the personal information is collected or used, and whether that information is sold or shared so that you have a tool to exercise meaningful control over our use of your personal information. For example, you may use the information in this notice to choose whether or not to engage with us, to direct us not to sell or share your



The available responses to *Categories of personal information disclosed* are documented in the [Appendix](#).



Appendix

This appendix contains the possible responses to certain questions in the CCPA workflow. Questions are grouped by response options.

Question	Tab Location	Responses
<i>Categories of personal information collected within the preceding 12 months</i>	Collected Personal Information	<ul style="list-style-type: none"> Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
<i>Categories of personal information sold or shared type</i>	Selling or Sharing Personal Information	<ul style="list-style-type: none"> Characteristics of protected classifications under California or federal law Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies Biometric Information
<i>Categories of personal information disclosed type</i>	Disclosed Personal Information	<ul style="list-style-type: none"> Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement Geolocation Data Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information Professional or Employment-Related Information
<i>Categories of personal information collected</i>	Notice at Collection	<ul style="list-style-type: none"> Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act Inferences drawn from any of the information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes



Question	Tab Location	Responses
<i>Business or commercial purpose for collecting personal information in the preceding 12 months</i>	Collected Personal Information	<ul style="list-style-type: none"> • Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards • Helping to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for these purposes • Debugging to identify and repair errors that impair existing intended functionality • Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of a consumer's current interaction with the institution, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the institution
<i>Business or commercial purpose for selling or sharing personal information in the preceding 12 months</i>	Selling or Sharing Personal Information	<ul style="list-style-type: none"> • Performing services on behalf of the institution, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of the institution • Providing advertising and marketing services, except for cross-context behavioral advertising, to the consumer provided that, for the purpose of advertising and marketing, a service provider or contractor shall not combine the personal information of opted-out consumers that the service provider or contractor receives from, or on behalf of, the business with personal information that the service provider or contractor receives from, or on behalf of, another person or persons or collects from its own interaction with consumers
<i>Business or commercial purpose for disclosing personal information to third parties in the preceding 12 months</i>	Disclosed Personal Information	<ul style="list-style-type: none"> • Undertaking internal research for technological development and demonstration • Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business