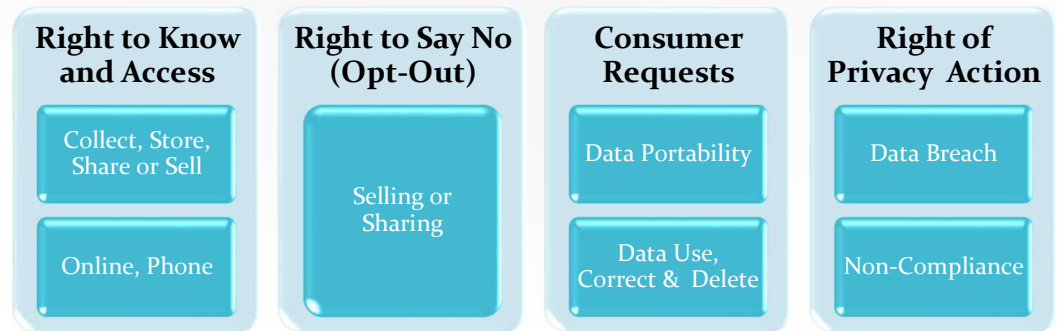


U.S. Privacy Laws – CCPA and NYPA Summary

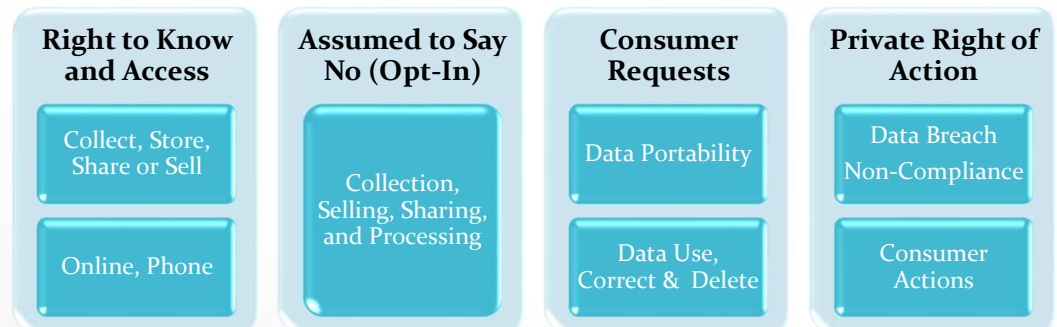
✦ Consumer Privacy Rights

- ✦ California – CCPA/Prop 24 (Passed 2018, 2020)
 - ✦ Public, Customer and Employee information of CA Residents
 - ✦ Both consumer rights and data management
 - ✦ Exemptions for corporate size, some data types
 - ✦ Financial Penalties for non-compliance



✦ New York S5642 (in Committee)

- ✦ NY “Natural Person” information
- ✦ Definition of information is broader than CCPA, beyond GLBA definitions
- ✦ Both consumer rights and data management
- ✦ Few exemptions, Fiduciary obligation



Dayspring Consumer Privacy Law Compliance Services

- ✦ Data Definition, Applicability and Collection
 - ✦ Define data controllers and data processors at compliant entity
 - ✦ Data definition, properties, medium and type
 - ✦ Data storage, infrastructure, protections and management systems in place
 - ✦ Inclusions, exemptions, requirements to provide products and services, common controls
- ✦ Data Subject Access Request Workflow and Management
 - ✦ Capture and manage data subject requests
 - ✦ Validate requests and rights
 - ✦ Data Discovery
 - ✦ Complete and confirm required actions
 - ✦ Data Presentation/Reporting
 - ✦ Compliance, auditing and continuous improvement
- ✦ Applying Appropriate Technology
 - ✦ Identify best-fit technology suppliers and needs
 - ✦ Supplier management, implement and configure solution to data definition, workflow, reporting and compliance
 - ✦ Training, maintenance
- ✦ Program Maturity
 - ✦ NIST Privacy Framework
 - ✦ ISO27701