



AUDITS UPDATE

California Privacy Protection Agency
August 7, 2026

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OVERVIEW

- Audits Division Growth and Approach
- Audits Division 2026 Activity and Priorities
- Looking Ahead: 2027 and Beyond

AUDITS DIVISION: AUTHORITY

Section 24 of the California Privacy Rights Act created this role.

Civil Code § 1798.199.40(f) states:

“The agency shall... appoint a Chief Privacy Auditor to conduct audits of businesses to ensure compliance with this title”

AUDITS DIVISION: AUTHORITY

- (a) Scope. The Agency may audit a business, service provider, contractor, or person to ensure compliance with any provision of the CCPA.
- (b) Criteria for Selection. The Agency may conduct an audit to investigate possible violations of the CCPA. Alternatively, the Agency may conduct an audit if the subject's collection or processing of personal information presents significant risk to consumer privacy or security, or if the subject has a history of noncompliance with the CCPA or any other privacy protection law.
- (c) Audits may be announced or unannounced as determined by the Agency.
- (d) Failure to Cooperate. A subject's failure to cooperate during the Agency's audit may result in the Agency issuing a subpoena, seeking a warrant, or otherwise exercising its powers to ensure compliance with the CCPA.

GLOBAL CONTEXT



Financial Consumer
Agency of Canada
Agence de la
consommation en
matière financière
du Canada

Office of the
Privacy Commissioner
Commissariat à la
protection de la vie
privée du Canada



Australian Government

**Office of the Australian
Information Commissioner**



Office of the
Privacy Commissioner
of Canada

Commissariat
à la protection de
la vie privée du Canada

AUDITS DIVISION

The Division seeks to increase regulated entities' compliance through proactive engagement and structured review.

AUDITS DIVISION

- Auditors
- Research Technologists
- Interns

STRATEGY

Focusing on proactive, risk-and-harm reduction approach

AUDIT THEMES

- Assess trends, common practices, and compliance risks within sectors
- Leverage sectoral audits with public reports to enable public awareness of findings, including themes in remediations, best practices, or other notable learnings

Gig-Economy Sectoral Audit

- CalPrivacy is tasked with protecting consumers, and that includes workers and applicants
- The right to know what personal information a business has collected about consumers is often foundational to enabling them to exercise other rights, including the right to correct, delete, etc.

PUBLISHING TECHNOLOGIST QUESTIONS

- This series identifies relevant areas of research to support the development of future compliance inquiry methodologies that CalPrivacy and others can leverage
- First in the series published this week:
 - Emerging Technology, Inference, and Identifiability: CalPrivacy Audits Technologist Research Questions



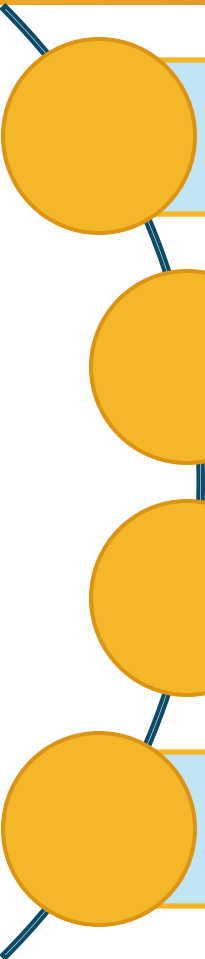
OPEN QUESTIONS FOR RESEARCHERS

- Inference techniques in emerging technologies
- Auditing techniques to assess a model's capacity to infer and act on attributes
- Models' leakage of personal information and mitigations influencing that leakage

LOOKING AHEAD TO 2027

- Automated Decision-Making Technology (ADMT) audits
- Building Cybersecurity and Risk Assessment audit capacity and Submission Portal
- Building stakeholder engagement capacity

Key Compliance Dates



January 1, 2027: ADMT requirements

April 1, 2028: First Risk Assessment submissions and CSA Certifications for Businesses >\$100M due

April 1, 2029: First CSA Certifications for Businesses >\$50M due

April 1, 2030: First CSA Certifications for Businesses <\$50M due

PREPARING FOR CYBERSECURITY AUDITS: ANNUAL SUBMISSION TO CALPRIVACY



Risk Assessments: First submission of risk assessment information is due by **April 1, 2028**, and then annually after.



Cybersecurity Audits: Phased-in certification submissions based on annual gross revenue between **April 1, 2028** and **April 1, 2030**, and then annually thereafter

Both the risk assessment information and cybersecurity audit certifications must be submitted to CalPrivacy via its website.

QUESTIONS

