

BEFORE THE CALIFORNIA PRIVACY PROTECTION AGENCY

In the Matter of:

CLARIVATE ANALYTICS (US) LLC AND
DR/DECISION RESOURCES LLC,

Respondents.

Case No. ENF26-03-D-CL

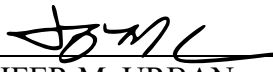
ORDER OF DECISION

The Board of the California Privacy Protection Agency hereby adopts the Stipulated Final Order, attached hereto, as its decision in the above-entitled matter.

This Decision shall become effective immediately.

IT IS SO ORDERED this 24th day of June, 2026.

BY THE BOARD:



JENNIFER M. URBAN
Chair
California Privacy Protection Agency

MICHAEL S. MACKO (SBN 335866)
Deputy Director of Enforcement
LARA KEHOE HOFFMAN (SBN 180466)
Assistant Chief Counsel
GARY LEE (SBN 353015)
NEELOFER SHAIKH (SBN 324439)
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BEFORE THE CALIFORNIA PRIVACY PROTECTION AGENCY

Case No. ENF26-03-D-CL

In the Matter of:

CLARIVATE ANALYTICS (US) LLC and
DR/DECISION RESOURCES LLC,

Respondents.

STIPULATED FINAL ORDER

IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-entitled matter:

I. INTRODUCTION

1. California’s data broker registry—operated by the California Privacy Protection Agency—brings transparency to the industry and gives Californians an easy way to exercise their privacy rights, such as by telling data brokers to delete their personal information. Californians can do so by submitting their request in the Delete Request and Opt-out Platform (“DROP”). Data brokers, in turn, must process these deletion requests.

2. The registry gives Californians visibility into the data collection practices of each data broker. For example, to register, the law requires data brokers to provide information about the data they collected, including whether it encompassed things like immigration status, union membership, sexual orientation, gender identity, biometric data, and reproductive health data, among others. *See* Civ. Code § 1798.99.82(b)(2).

3. To complete this picture, the registry gives Californians certain information about where their data has gone. Data brokers must provide information in their registration about whether they shared or sold Californians' data to the federal government, a state government, law enforcement, a foreign actor, or developers of GenAI systems. *See id.*

4. The registry, and the transparency it provides to the public, depend on data brokers providing accurate information. Data brokers must provide “only true and correct responses when submitting the registration information.” Cal. Code Regs., tit. 11, § 7603(a).

5. Data brokers who fail to provide the required information in their registration violate the law: data brokers are liable for an administrative fine of \$200 “for each day the data broker fails to register *as required by this section*.” Civ. Code § 1798.99.82(c) (emphasis added).

II. PARTIES

6. Complainant is the Enforcement Division of the California Privacy Protection Agency (“Agency”), which enforces the California Consumer Privacy Act of 2018 (“CCPA”), Civ. Code §§ 1798.100 – 1798.199.100, as amended, and the data broker registration obligations contained in the Delete Act, Civ. Code § 1798.99.82(c).

7. Respondent Clarivate Analytics (US) LLC (“Clarivate”) is a Delaware limited liability company with its principal place of business in Ann Arbor, Michigan. Clarivate describes itself as a leading global provider of transformative intelligence that offers enriched

data, insights and analytics, workflow solutions, and expert services in the areas of academia and government, intellectual property, and life sciences and healthcare. Clarivate has conducted and continues to conduct business within the State of California.

8. Respondent DR/Decision Resources LLC (“DR/Decision Resources”) is a Delaware limited liability company with its principal place of business in Ann Arbor, Michigan and an affiliate of Clarivate since 2020. Clarivate describes DR/Decision Resources as a premier provider of high-value data, analytics, and insights products to the healthcare industry. DR/Decision Resources has conducted and continues to conduct business within the State of California.

III. JURISDICTION

9. Pursuant to Civil Code § 1798.99.82(c), the Agency may bring an administrative action against a data broker that fails to register with the Agency as required by law.

10. Pursuant to Government Code § 11415.60(a), the Agency may formulate and issue a decision by settlement, pursuant to an agreement of the parties, without conducting an adjudicative proceeding.

IV. FACTUAL FINDINGS

11. Clarivate and DR/Decision Resources are for-profit legal entities that license professional contact information for individuals practicing in the life sciences and healthcare industries. That professional contact information includes California consumers’ personal information, for which Clarivate and Decision Resources determine the purposes and means of the processing, qualifying the entities as data brokers.

12. Clarivate and DR/Decision Resources conduct business as data brokers by knowingly collecting and selling to third parties the personal information of consumers with whom they do not have a direct relationship.

13. Clarivate and DR/Decision Resources conducted business as data brokers during the 2025 calendar year.

14. On or before January 31 following each year in which a business meets the definition of a data broker, the business shall register with the Agency pursuant to the requirements in section 1798.99.82 of the Civil Code. *See* Civ. Code § 1798.99.82.

15. Data brokers must provide “only true and correct responses when submitting the registration information required by Civil Code section 1798.99.82 and this Chapter.” Cal. Code Regs., tit. 11, § 7603(a).

16. On January 31, 2026, Clarivate and DR/Decision Resources submitted registration forms to the Agency for their 2025 activities. When responding to the registration questions, Clarivate and DR/Decision Resources each answered “yes” to the following question: *Did the data broker share or sell consumers’ data to a foreign actor in the past year?*

17. A “foreign actor” means either of the following:

- (i) The government of a foreign adversary country.
- (ii) A partnership, association, corporation, organization, or other combination of persons organized under the laws of or having its principal place of business in a foreign adversary country.

Civ. Code § 1798.99.82(f)(1).

18. A “foreign adversary country,” in turn, means a “‘covered nation’ as defined in Section 4872 of title 10 of the United States Code.” Civ. Code § 1798.99.82(f)(1)(B). Thus, a

covered nation refers to “the Democratic People’s Republic of North Korea, the People’s Republic of China, the Russian Federation, and the Islamic Republic of Iran.” 10 U.S.C. § 4872(f)(2).

19. Consequently, the 2026 registry shows the following for Clarivate and DR/Decision Resources:

DATA SOLD / SHARED TO

Foreign Actor

Federal Government

State Governments

20. On March 26, 2026, Clarivate contacted the Agency to notify it that certain information in its registration was incorrect, and clarified in a communication on March 27, 2026, that Clarivate and DR/Decision Resources did not sell or share information with foreign actors and should have answered the question “no” rather than “yes.”

21. Clarivate explained that this mistake occurred because it “did not take into account the foreign adversary definition within the regulation,” citing the novelty of the requirement (introduced in 2025 under Senate Bill 361) resulting in “a misunderstanding of the term.”

22. Although Clarivate asserts it undertook a good faith effort to provide true and correct information in its registration and attempted to complete the registration requirements in accordance with Civil Code § 1798.99.82 within the time period prescribed, by failing to provide true and correct information as part of the registration process, Clarivate and DR/Decision Resources did not satisfy the registration requirements set forth by Civil Code § 1798.99.82.

23. Fines under the Delete Act are fixed at \$200 per day for failing to register “as required by this section.” Civ. Code § 1798.99.82(c). Fines serve the remedial purpose of offsetting the harm that comes from data brokers who fail to register in accordance with the law’s requirements. *See id.* § 1798.99.82(e).

24. Data brokers must take seriously the requirements to provide correct information.

25. The integrity of the registry depends upon data brokers complying with the law’s requirements. Data brokers must provide “only true and correct responses” as a cornerstone of the registry. Cal. Code Regs., tit. 11, § 7603(a).

26. When data brokers disclose the types of personal information they collected as required by section 1798.99.82 of the Civil Code, Californians should be able to rely on those disclosures. Californians likewise should be able to rely upon data brokers’ disclosures about whether they sold or shared this data with federal and state governments, as well as with foreign actors such as China, Iran, North Korea, and Russia.

27. The 2026 registration period closed on January 31, 2026. After the registration period has closed, data brokers may only update (through their DROP account) certain information in the registry: (1) a change in the name, email, or phone number of the point of contact; (2) a change in the data broker’s public-facing contact information, provided pursuant to Civil Code section 1798.99.82(b)(2)(A); or (3) a change in the data broker’s public-facing website addresses, provided pursuant to Civil Code section 1798.99.82(b)(2)(A) and (b)(2)(G). *See* Cal. Code Regs., tit. 11, § 7604(b)(1)-(3).

28. Data brokers cannot otherwise change information in their registration, consistent with the requirement that data brokers provide true and correct information in the first place.

29. Although Clarivate asserts that it registered in a timely and good-faith manner before the January 31 deadline, we must give meaning to the words “register *as required by this section*,” because “significance should be given to every word, phrase, sentence and part of an act in pursuance of the legislative purpose.” *Woosley v. State of Cal.*, 3 Cal. 4th 758, 775-76 (1992) (citing *Moyers v. Workmen’s Comp. Appeals Bd.*, 10 Cal. 3d 222, 230 (1973)). A “construction making some words surplusage is to be avoided.” *Id.*

30. To give meaning to the words “as required by this section,” data brokers are liable for the \$200 per day fine when they do not disclose their data sharing practices over the past year, such as whether they shared or sold Californians’ personal information to foreign actors, because it is one of the registration requirements in section 1798.99.82.

31. Any other interpretation would lead to an absurd conclusion that data brokers properly register even when they provide false or incorrect information. We must avoid interpretations that “would lead to absurd consequences.” *Smith v. Superior Court*, 39 Cal. 4th 77, 83 (2006).

32. Clarivate and DR/Decision Resources agree to the terms below to prevent a similar scenario from happening in the future, remedy the past harm, and ensure accurate registration.

V. CONTINGENCY

33. This Stipulated Final Order shall be contingent upon approval by the Board of the California Privacy Protection Agency (“Board”). Clarivate and DR/Decision Resources understand and agree that counsel for Complainant and the staff of the Agency may communicate directly with the Board and the staff of the Agency regarding this Stipulated Final Order, without notice to or participation by Respondent or its counsel. By signing the Stipulated

Final Order, Clarivate and DR/Decision Resources understand and agree that they may not withdraw their agreement or seek to rescind the Stipulated Final Order before the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Order of Decision, the Stipulated Final Order shall be of no force or effect except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Agency shall not be disqualified from further action by having considered this matter.

VI. OTHER MATTERS

34. The parties understand and agree that Portable Document Format (“PDF”) and facsimile copies of this Stipulated Final Order, including PDF and facsimile signatures thereto, shall have the same force and effect as the originals. The parties may execute this Stipulated Final Order in counterparts.

35. This Stipulated Final Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Final Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

36. In consideration of the foregoing stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order of Decision:

VII. ORDER

IT IS HEREBY ORDERED that:

37. Clarivate and DR/Decision Resources shall each pay an administrative fine in the amount of ten thousand, eight hundred dollars (\$10,800.00) in accordance with section 1798.99.82(c) of the Civil Code. Clarivate and DR/Decision Resources shall each remit payment in full within thirty (30) days of the Board's Order of Decision approving the Stipulated Final Order pursuant to written instructions to be provided by the Enforcement Division.

38. Clarivate's and DR/Decision Resources' requests to change their 2026 registrations to reflect that they did not share or sell personal information with a foreign actor is hereby construed as a written request for removal from the registry based on erroneous registration pursuant to title 11, section 7604(a) of the California Code of Regulations, and as a corresponding request to re-register *nunc pro tunc* as of the date of Clarivate's and DR/Decision Resources' original registrations—with all information unchanged except their responses to whether they shared or sold information with a foreign actor. So construed, the request is granted. The Agency shall process Clarivate's and DR/Decision Resources' 2026 registrations to reflect that Clarivate and DR/Decision Resources did not share or sell information to a foreign actor, leaving the remaining information unchanged and crediting Clarivate's and DR/Decision Resources' previous payment of the annual fee.

39. Clarivate and DR/Decision Resources shall comply with section 1798.99.82 of the Civil Code, timely register as a data broker, and provide only true and correct responses regarding their operations for any future years in which Clarivate and DR/Decision Resources operate as a data broker.

40. Within ninety (90) days of the Board's Order of Decision approving the Stipulated Final Order, and to the extent they have not already done so, Clarivate and DR/Decision Resources shall (i) adopt policies and procedures to ensure timely registration as a data broker in compliance with the Delete Act; and (ii) review the requirements and definitions of the Delete Act to ensure that Clarivate and DR/Decision Resources provide only true and correct information with their respective annual registrations.

41. Each party shall bear its own attorneys' fees and costs.

VIII. ADDITIONAL GENERAL PROVISIONS

42. Nothing in this Stipulated Final Order shall be construed as relieving Clarivate or DR/Decision Resources of their obligations to comply with all state and federal laws, regulations, or rules, or as granting permission to engage in any acts or practices prohibited by such law, regulation, or rule.

43. Clarivate and DR/Decision Resources shall use reasonable efforts to notify their officers, directors, employees, agents, and contractors, as applicable, responsible for carrying out and effecting the terms of this Stipulated Final Order and the requirements therein.

44. Clarivate and DR/Decision Resources agree that the terms of this Stipulated Final Order are in the public interest and fair, adequate, and reasonable under all the circumstances.

45. Clarivate and DR/Decision Resources admit the truth of the factual findings in paragraphs 11-21 and 24-26 of this Stipulated Final Order, but otherwise neither admit nor deny the remaining paragraphs. Clarivate and DR/Decision Resources agree to be bound by the terms of this Stipulated Final Order. Clarivate and DR/Decision Resources admit that, in general, data brokers who fail to provide true and correct registration information violate section 1798.99.82(b) of the Civil Code and title 11, section 7603(a) of the California Code of

Regulations and are thus liable for a \$200/day fine pursuant to section 1798.99.82(c)(1) of the Civil Code.

46. Clarivate and DR/Decision Resources hereby waive the right to any hearings, and to any reconsideration, appeal, or other right to review which may be afforded pursuant to the California Administrative Procedure Act, the California Code of Civil Procedure, or any other provision of law. By waiving such rights, Clarivate and DR/Decision Resources effectively consent to this Stipulated Final Order becoming final.

47. This Stipulated Final Order shall bind Clarivate's and DR/Decision Resources' heirs, administrators, executors, successors, and transferees.

48. Notwithstanding paragraph 41, in the event the Agency prevails in seeking to enforce any term of this Stipulated Final Order, the Agency shall be entitled to an award of reasonable attorneys' fees and costs in its favor and against Clarivate and DR/Decision Resources for the time spent and costs incurred in prosecuting such action.

49. Failure to complete the payment or comply with any terms of this Stipulated Final Order shall result in enforcement of the Order in the Superior Court.

50. The provisions of this Stipulated Final Order shall apply for a period of five (5) years from the effective date of the Board's Order of Decision.

51. Any notices and reports under this Stipulated Final Order shall be served by email as follows:

To the Complainant:

Deputy Director, Enforcement Division
California Privacy Protection Agency
400 R Street, Suite 350
Sacramento, CA 95811
ENF-processing@coppa.ca.gov

To the Respondents:

John Doulamis
Senior Vice President and General Counsel
Clarivate Analytics (US) LLC
John.Doulamis@clarivate.com

John Doulamis
Senior Vice President and General Counsel
DR/Decision Resources LLC
John.Doulamis@clarivate.com

With a copy (which shall not constitute notice) to:

Scott T. Loughlin, Esq.
Hogan Lovells US LLP
Scott.loughlin@hoganlovells.com

IX. ACCEPTANCE

I have carefully read the above Stipulated Final Order and have had the opportunity to seek and consult with an attorney. I understand the stipulation and the effect it will have on Clarivate and DR/Decision Resources. I enter into this Stipulated Final Order voluntarily, knowingly, and intelligently, and agree to be bound by the Order of Decision by the Board of the California Privacy Protection Agency.

Dated: May 28, 2026

Dated: May 28, 2026



John Doulamis
Senior Vice President and General Counsel
CLARIVATE ANALYTICS (US) LLC
Respondent



John Doulamis
Senior Vice President and General Counsel
DR/DECISION RESOURCES LLC
Respondent

AS TO FORM AND CONTENT:

Dated: June 4, 2026

A handwritten signature in black ink, appearing to read "Scott T. Loughlin", positioned above a horizontal line.

Scott T. Loughlin, Esq.
Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street, NW
Washington, DC 20004
Attorney for Respondents

X. ENDORSEMENT

The foregoing Stipulated Final Order is hereby respectfully submitted for consideration
by the Board of the California Privacy Protection Agency.

DATED: June 5, 2026

BY:



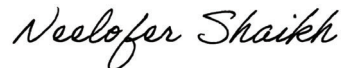
MICHAEL S. MACKO
Deputy Director of Enforcement



LARA KEHOE HOFFMAN
Assistant Chief Counsel



GARY LEE
Attorney, Enforcement Division



NEELOFER SHAIKH
Attorney, Enforcement Division
Attorneys for Complainant