



California Privacy Rights Act Of 2020 (CPRA)

California Privacy Rights Act (CPRA) FAQ

<https://www.dnb.com/cpra-faqs>

Dun & Bradstreet is deeply committed to complying with all applicable privacy laws and regulations and our CPRA compliance program is already under way. Read on to find out more about the CPRA and what we are doing to prepare for this new law.

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I. What is the CPRA?

The CPRA stands for The California Privacy Rights Act. The CPRA was passed by the California legislature in November 2020 and will go into effect on January 1, 2023. This Act builds on the California Consumer Privacy Act of 2018 (CCPA), which went into effect on January 1, 2020. For more information on the CCPA, please see our [CCPA FAQs](#). Much like the CCPA, the CPRA gives California residents certain rights, including:

- the right to know what personal information is being collected about them and how such personal information is being sold and disclosed
- the right to opt out of the sale of their personal information
- the right to delete the personal information that was collected from the California resident
- the right to be free from discrimination for exercising these rights
- [The CPRA also includes a right to correct inaccurate personal information](#)

II. Does the CPRA apply to Dun & Bradstreet?

The CPRA, much like the CCPA, applies to Dun & Bradstreet to the extent we collect or sell personal information on California residents. Our main focus is to provide commercial data on business entities. However, business related personal information may be found in our products and this type of information is covered by the CPRA. The CPRA also applies to Dun & Bradstreet when we collect personal information on our employees, customers and vendors.

III. Who is covered by the CPRA?

The CPRA covers personal information collected about “California consumers” Both the CPRA and the CCPA define “consumer” as a resident of the state of California. That would include

- consumers as traditionally defined (people purchasing goods and services for personal, household and family use) AND
- individuals acting in their business capacity (sole proprietorships, officers, directors and shareholders, and employees).

IV. How does the CPRA define personal information?

The CCPA defined personal information very broadly. Any information that identifies, relates to, describes, is capable of being associated with or could be reasonably linked, directly or indirectly, with a particular consumer or household, is covered.

The CPRA’s definition is substantially similar: information that identifies, relates to, describes, is [reasonably](#) capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household is personal information. Although this makes the definition slightly narrower, in effect this is still very similar to the definition found in the CCPA.

V. How does the CPRA define sensitive personal information?

In addition to the definition of personal data, [the CPRA now also includes a definition of “sensitive personal information”](#). Sensitive personal information is defined as:

- a consumer's social security, driver's license, state identification card, or passport number;
- a consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account;
- a consumer's precise geolocation;
- a consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership;

- the contents of a consumer's mail, email and text messages, unless the business is the intended recipient of the communication;
- a consumer's genetic data; and
- the processing of biometric information for the purpose of uniquely identifying a consumer
- personal information collected and analyzed concerning a consumer's health
- personal information collected and analyzed concerning a consumer's sex life or sexual orientation.

A link entitled "Limit the Use of My Sensitive Personal Information" will need to be added to the California section of the Privacy Notice, and a process for limiting the use and disclosure of sensitive personal information will need to be implemented.

VI. Is any personal information excluded from the CPRA?

Under the CPRA, **all** publicly available information is excluded. [This is no longer limited to publicly available information from government sources.](#) This makes it more important than ever to identify and track sources of information and whether the information is publicly available.

The CPRA continues to exclude personal information that is already protected under federal law, such as HIPAA and FCRA data.

VII. What does this mean to D&B?

The current CCPA program is a solid foundation which can be relied on to build up our CPRA compliance. As always, Dun & Bradstreet intends to be pro-active in our compliance efforts and leverage our existing program to continually improve. In preparation for the CPRA, significant updates will be required for our privacy notice, including updates to the forms data subjects may use to request their CCPA/CPRA rights, expanding the program and CCPA/CPRA rights to California employees, and ensuring that collection, use, retention and sharing of consumer's personal information is reasonably necessary and proportionate to achieve the purposes for which it was collected or for another compatible purpose that has been disclosed to the consumer. Further updates will be required for training and FAQs, vendor and customer contracts and the Third Party CCPA/CPRA Requests Portal. The California Attorney general will issue additional regulations around these requirements. Dun & Bradstreet will need to monitor for updates and changes in this area.

VIII. What are the penalties for violating the CPRA?

As with the CCPA, the CPRA provides for a penalty of up to \$2,500 for each violation and up to \$7,500 for each **intentional** violation. [The CPRA goes one step beyond the CCPA in providing for personal liability, as well. Meaning, if a person intentionally violates the CPRA, that person as well as the business they work for may be held liable for their actions.](#)

IX. Contact Us

Please let us know if you have any questions about our CPRA program by contacting us at PrivacyOfficer@dnb.com. Dun & Bradstreet has been, and will continue to be, committed to complying with the CPRA and all applicable data protection laws.