

CALIFORNIA PRIVACY RIGHTS ACT OF 2020: KEY DATES

On November 3, 2020, California voters approved Proposition 24 and created the new [California Privacy Rights Act of 2020](#) (the “CPRA”). The CPRA amends and expands the existing California Consumer Privacy Act of 2018 (the “CCPA”), introducing new rights for California consumers and obligations for businesses that collect and process their personal information. Most of the CPRA’s substantive provisions will not take effect until January 1, 2023, but there are some important dates businesses should be aware of before then. Businesses should also understand that the CCPA (and its implementing regulations) will continue to be in effect until the CPRA becomes fully enforceable in 2023.

1. **ON OR BEFORE DECEMBER 11, 2020:** The California Secretary of State certifies the election results.
2. **ON OR BEFORE DECEMBER 16, 2020:** The CPRA becomes effective five days after the Secretary of State certifies the vote, and certain provisions of the CPRA will become operative. Specifically, the employment and B2B exemptions included in the CCPA are immediately extended to January 1, 2023, and funding and establishment of the new California Privacy Protection Agency (the “Agency”) may begin.
3. **BY MARCH 9, 2021:** Initial appointments to the California Privacy Protection Agency will be made (within 90 days of the effective date of the Act).
4. **ON OR AROUND JULY 1, 2021:** The Agency begins the rulemaking process (note this date may be moved depending on when the Agency formally notifies the California Attorney General that it is prepared to assume rulemaking responsibilities).
5. **JANUARY 1, 2022:** The 12-month lookback period begins, meaning that personal information collected by businesses starting on this date will be subject to the CPRA’s requirements (with some exceptions).
6. **JULY 1, 2022:** The deadline for the Agency to adopt the final CPRA regulations.
7. **JANUARY 1, 2023:** The CPRA becomes fully operative. The employment and B2B exemptions expire and such data becomes fully regulated by the CPRA.
8. **JULY 1, 2023:** The Agency can begin enforcing the CPRA and its implementing regulations.