

Case Study

Downstream CCPA Opt-Out and DSAR Notifications to 3rd, 4th and 5th Party Vendors

oVertone Haircare is a leader in the \$1.7B (US) organic hair coloring market, selling directly to consumers via a state-of-the-art eCommerce website and backend.

Typical of modern eCommerce operations, oVertone's business interacts with many third party vendors that are provided with user data as needed to provide operational support, analytics, and fulfillment.

In 2019, when oVertone initially adapted its operations to comply with GDPR and later, CCPA, the Company realized that the regulations required it to notify each of its data sharing vendors whenever a user exercised their rights to opt out, or request access to their data.

oVertone's Challenges

Rapid Growth Of Sales And Privacy Awareness

During 2019-2020, oVertone was experiencing hypergrowth at the same time consumers were being bombarded with information about privacy impacts of eCommerce shopping, as well as the enactment of the CCPA in January 2020.

As a market leader, oVertone wanted to use privacy management as a positive reinforcement for its customer base by providing an excellent user experience for anyone who chose to view its privacy notices or exercise CCPA rights.

Manual Notification Quickly Proved Unworkable

An initial attempt to use spreadsheets and batch processes to notify downstream data partners worked, but as DSAR traffic increased it became obvious that an automated system would be required.

Because inbound DSAR/Opt-out notifications are a new privacy requirement, some vendors did not have their own systems in place to handle them.



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As our predominantly mobile eCommerce business has grown dramatically over the past 2 years, the PrivacyUX system has kept up with our increased traffic and rights activity with no glitches.

The automation of downstream DSAR and opt out requests to our vendors has allowed us to focus on our business growth tasks, exactly what we look for in a SaaS compliance tool like this.

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**Anthony Salinas,
Chief Operating Officer**

About PrivacyCheq

Since its founding in 2013, PrivacyCheq has been a leader in the regulatory compliance tech industry with innovative cloud-based transparency and consent/opt-out management for global enterprises. The company offers a variety of cloud services facilitating operational compliance with GDPR, CCPA, COPPA, PIPEDA, and LGPD.

Solution

PrivacyUX for CCPA Automates Downstream Vendor Notification

In addition to its primary purpose of providing operational notice and opt out management, the PrivacyUX for CCPA service was expressly designed to elegantly handle the notification requirements of downstream third, fourth and fifth party data sharers.

For tightly integrated vendors that require real-time opt-in or consent verification, the service offers a managed API that allows trusted vendors instantaneous access to each user's privacy preferences or rights requests.

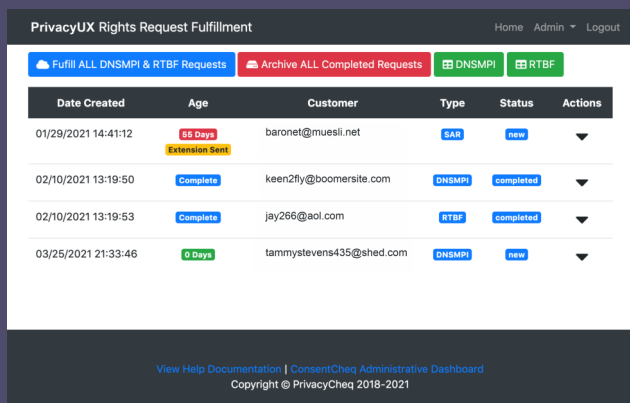
But like many eCommerce vendors, oVertone's third parties were unwilling or unable to create

bespoke interfaces to use the API. For this case, PrivacyUX for CCPA features an email system that automatically notifies vendors when a specific user request is received by oVertone - as required by GDPR and CCPA. When oVertone adds or changes vendors, an administrative dashboard facilitates maintaining the notification list.

Since implementing PrivacyUX for CCPA in 2019, oVertone's DSAR/OptOut notification services have been keeping oVertone's vendors in sync with their customers' privacy preferences.

Results

In the first six months, PrivacyUX passed along nearly 5000 third party vendor notifications when California - based customers exercised their CCPA rights to opt out.



The screenshot shows a dashboard titled "PrivacyUX Rights Request Fulfillment" with navigation links for Home, Admin, and Logout. It features two main buttons: "Fulfill ALL DNSMPi & RTBF Requests" and "Archive ALL Completed Requests". Below these are filters for "DNSMPi" and "RTBF". A table lists request details:

Date Created	Age	Customer	Type	Status	Actions
01/29/2021 14:41:12	88 Days Extension Sent	baronet@muesli.net	SAB	new	
02/10/2021 13:19:50	Complete	keen2fly@boomersite.com	DNSMPi	completed	
02/10/2021 13:19:53	Complete	jay266@aol.com	RTBF	completed	
03/25/2021 21:33:46	0 Days	tammystevens435@shed.com	DNSMPi	new	

At the bottom, there is a footer: "View Help Documentation | ConsentCheq Administrative Dashboard Copyright © PrivacyCheq 2018-2021".

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PrivacyCheq's suggestions of how to best comply with CCPA and their ability to help us in implementation were fantastic. We always checked our final implementations with our legal counsel, but their industry knowledge saved us a lot of back and forth with our lawyers. The responsiveness of this company to help was the key to getting our solution deployed in time.

Ty Smith,
Chief Technical Officer

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