

CONTROLLED DOCUMENT

California DROP readiness preflight

Northshore Audience Services, Inc. (fictional sample). Assessment SAMPLE-DROP-001. Rule pack california-drop-2026-07-31.1. Record date 6 August 2026.

Document control

Field	Value
Organisation	Northshore Audience Services, Inc. (fictional sample)
Document type	California DROP readiness assessment
Document reference	SAMPLE-DROP-001
Jurisdiction	United States
Version	1.0
Status	Final
Classification	Internal compliance record
Prepared by	Privacy Operations
Prepared on	6 August 2026
Rule pack	california-drop-2026-07-31.1
Sources reviewed	31 July 2026
Generated	6 August 2026

Scope record

The organisation confirmed that it is a California data broker. This preflight records supplied implementation evidence against the final DROP regulations.

Field	Value
Organisation	Northshore Audience Services, Inc. (fictional sample)
Assessment reference	SAMPLE-DROP-001
Review owner	Privacy Operations
Requested record status	final
California data broker status	Confirmed California data broker
Operating status	Operating before 1 January 2026
Operating start date	15 April 2024
DROP account status	Active
Planned access method	Automated with manual fallback
Most recent DROP access	1 August 2026

Operational date prompts

Next DROP access no later than: 15 September 2026.

45 calendar days after the recorded last access. Confirm the operational count against the access-session record.

Previous-session status report: 15 September 2026.

Report the previous access session before or during the next access session.

Assessment summary

Final means that every control record contains the information required for review. It does not mean that every control is implemented.

Readiness measure	Result	Action measure	Count
Record status	Final	Open actions	5
Complete control records	21 of 21	Missing controls	3
Evidence identified	16	Uncertain controls	2

Open action schedule

Requirement	Status	Owner	Due date
Incremental-list reconciliation	Uncertain	Data Engineering Manager	28 August 2026
Archives and backups	Missing	Platform Engineering Manager	15 September 2026
Future matching for unmatched requests	Uncertain	Data Engineering Manager	5 September 2026
Stopping and restarting access	Missing	Privacy Operations Manager	31 August 2026
Restricted use, security and no verification contact	Missing	Chief Privacy Officer	21 August 2026

Requirement	Action
Incremental-list reconciliation	Complete a full re-download and reconciliation exercise, then approve the recovery procedure.
Archives and backups	Add DROP deletion handling to restoration procedures and complete a backup-restoration test.
Future matching for unmatched requests	Verify cancellation handling and complete the pre-sale matching test suite.
Stopping and restarting access	Approve the cessation, DROP-data deletion, account deactivation and restart procedure.
Restricted use, security and no verification contact	Approve the DROP purpose restriction and add the no-verification-contact rule to staff guidance.

Credentials and authorised access - Evidence identified

11 CCR section 7610(a)(1)(A) and (B). Secure credentials are maintained and access to the DROP and DROP-derived information is restricted to authorised people.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: IAM-04, DROP access matrix, version 2.1, approved 31 July 2026.

Control owner: Information Security Manager.

Control test: ACR-08, quarterly access review completed 31 July 2026 with no exceptions.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Account incident route - Evidence identified

11 CCR section 7610(a)(1)(C) and (D). The broker can inform the CPPA immediately in writing about unauthorised account use or a related security breach and accepts responsibility for actions taken through the account.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: IR-12, CPPA account incident procedure, version 1.2.

Control owner: Security Incident Manager.

Control test: IR-DRILL-07, notification-route exercise completed 29 July 2026.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Required account details - Evidence identified

11 CCR section 7610(a)(2). The DROP account contains the business and trade names, point of contact, public contact details, websites and applicable EIN or TIN.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: DROP-ACC-01, account details checklist signed 30 July 2026.

Control owner: Privacy Operations Manager.

Control test: DROP-ACC-REVIEW-06, account fields reconciled to registration record.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Account activation and applicable fee - Evidence identified

11 CCR section 7611(a)(1), (3) and (4). The DROP account approval, applicable registration or first-access fee and first-access route are completed or assigned before access is required. A broker beginning after the registration period creates the account before operations begin.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: DROP-ACC-02, account approval notice and fee receipt.

Control owner: Privacy Operations Manager.

Control test: FIN-RECON-08, receipt matched to the approved DROP account.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DATA-BROKERS.

Deletion-list selection control - Evidence identified

11 CCR section 7610(a)(3). All deletion lists that can match identifiers in the broker's records are selected, any duplicate-list rationale is documented, new identifier categories trigger a review before the next access, and list changes are limited to once every 45 calendar days.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: DROP-LIST-03, identifier inventory and selected-list rationale.

Control owner: Data Governance Lead.

Control test: DROP-LIST-TEST-02, selected-list review completed 1 August 2026.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

First-access plan - Evidence identified

Civil Code section 1798.99.86(c); 11 CCR section 7611(a)(2). The broker has documented when its first DROP access is due, including the rule for a broker that begins operating after the registration period.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: DROP-OPS-01, first-access decision and operating calendar.

Control owner: Privacy Operations Manager.

Control test: DROP-OPS-REVIEW-01, operating dates checked against the account record.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT, CA-DROP-DATA-BROKERS.

45-day retrieval cadence - Evidence identified

11 CCR section 7612(a). The broker can retrieve every selected consumer deletion list at least once every 45 calendar days and retain evidence of each access session.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: DROP-OPS-02, 45-day access schedule and session register.

Control owner: Privacy Operations Analyst.

Control test: DROP-SESSION-2026-08-01, access receipt retained and next access scheduled.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Manual fallback and CPPA notice - Evidence identified

11 CCR section 7612(b). An automated-connection failure triggers manual retrieval. A failure not caused by the broker is reported to the CPPA in writing within 45 calendar days of the last access.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: DROP-BCP-01, manual retrieval and CPPA notice runbook.

Control owner: Business Continuity Manager.

Control test: DROP-BCP-DRILL-02, manual retrieval completed in the test environment.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Incremental-list reconciliation - Uncertain

11 CCR section 7612(c). The broker can distinguish initial complete lists from later new or amended requests and can request a complete re-download for reconciliation or audit when needed.

The organisation could not confirm whether the requirement is implemented. Human review is needed.

Available working reference: DROP-REC-04, draft full-list recovery design, version 0.4.

Action owner: Data Engineering Manager.

Planned action: Complete a full re-download and reconciliation exercise, then approve the recovery procedure.

Due date: 28 August 2026.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Identifier standardisation - Evidence identified

11 CCR section 7613(a)(1)(A). Matching logic applies the prescribed lowercasing, character handling, transliteration, date-of-birth, ZIP-code and phone-number standardisation, plus other standardisation known to increase matching, before comparison.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: MATCH-SPEC-07, identifier standardisation specification, version 3.0.

Control owner: Data Engineering Manager.

Control test: MATCH-TEST-118, prescribed standardisation vectors passed 30 July 2026.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

List-specified hashing - Evidence identified

11 CCR section 7613(a)(1)(B). The broker applies the hashing algorithm supplied with each deletion list to the same category of standardised identifier in its records.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: MATCH-SPEC-08, list-directed hashing control, version 2.0.

Control owner: Data Engineering Manager.

Control test: MATCH-TEST-121, algorithm-selection and repeatability tests passed.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Multiple-identifier and shared-identifier handling - Evidence identified

11 CCR section 7613(a)(2). Multiple identifiers are separately hashed, combined without added characters and hashed again. A shared identifier that maps to multiple consumers triggers opt-out handling for every associated consumer.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: MATCH-SPEC-09, multiple and shared identifier handling.

Control owner: Data Engineering Manager.

Control test: MATCH-TEST-126, combined-hash and shared-identifier cases passed.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Deletion scope and exceptions - Evidence identified

11 CCR section 7613(b)(1) and (A). A match results in deletion of associated non-first-party personal information, including inferences, unless a specific statutory exemption or first-party boundary applies.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: DEL-07, DROP deletion runbook and data-map appendix.

Control owner: Privacy Engineering Lead.

Control test: DEL-TEST-44, covered-data deletion and exception logging passed.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Minimum suppression record - Evidence identified

11 CCR section 7613(b)(1)(B). Only the minimum personal information needed for continuing compliance is retained and it is not used for another purpose unless a statutory exemption applies.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: DEL-08, minimum suppression schema and purpose restriction.

Control owner: Privacy Engineering Lead.

Control test: DEL-TEST-46, field minimisation and access restrictions verified.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Archives and backups - Missing

11 CCR section 7613(b)(1)(C). Deletion covers active, archived and backup systems, with any permitted delay limited until restoration or access for sale, disclosure or another commercial purpose.

The organisation answered no. No implementation evidence was identified for this requirement.

No implementation evidence reference was entered.

Action owner: Platform Engineering Manager.

Planned action: Add DROP deletion handling to restoration procedures and complete a backup-restoration test.

Due date: 15 September 2026.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Future matching for unmatched requests - Uncertain

11 CCR section 7613(c). Unmatched deletion lists are maintained solely for compliance and newly collected records are checked before the personal information is sold or shared.

The organisation could not confirm whether the requirement is implemented. Human review is needed.

Available working reference: MATCH-DESIGN-14, unmatched request queue design, version 0.8.

Action owner: Data Engineering Manager.

Planned action: Verify cancellation handling and complete the pre-sale matching test suite.

Due date: 5 September 2026.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Service-provider and contractor instructions - Evidence identified

11 CCR section 7613(d) and (e). Relevant service providers and contractors can be directed to delete covered information, using only the minimum information needed for compliance.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: VENDOR-12, DROP provider inventory and deletion instruction schedule.

Control owner: Vendor Governance Manager.

Control test: VENDOR-TEST-09, sample provider instruction acknowledged 31 July 2026.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Transaction status and response codes - Evidence identified

11 CCR section 7614(a) and (b). At each later access session, the broker can report the previous session's requests using the transaction identifier and exactly one permitted response code: Record deleted, Record opted out of sale, Record exempted or Record not found.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: DROP-STATUS-01, transaction status mapping, version 1.3.

Control owner: Privacy Engineering Lead.

Control test: DROP-STATUS-TEST-11, all four permitted response codes validated.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Manual CSV sequence and format - Evidence identified

11 CCR section 7614(c). A manual status upload can be completed before the next download in the same machine-readable CSV format, with response codes added.

Implementation was confirmed and the organisation identified a specific evidence reference.

Evidence reference: DROP-STATUS-02, manual CSV upload procedure and sample file.

Control owner: Privacy Operations Analyst.

Control test: DROP-STATUS-TEST-12, upload-before-download sequence completed.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Stopping and restarting access - Missing

11 CCR section 7615. If the business stops meeting the data broker definition, it can notify the CPPA within 45 calendar days, delete DROP-provided information on the required timetable and deactivate the account. A new account is created before later recommencing operations.

The organisation answered no. No implementation evidence was identified for this requirement.

No implementation evidence reference was entered.

Action owner: Privacy Operations Manager.

Planned action: Approve the cessation, DROP-data deletion, account deactivation and restart procedure.

Due date: 31 August 2026.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Restricted use, security and no verification contact - Missing

11 CCR section 7616. DROP information is used only for compliance, protected by reasonable security, never sold or shared, and not used to contact a consumer for verification.

The organisation answered no. No implementation evidence was identified for this requirement.

No implementation evidence reference was entered.

Action owner: Chief Privacy Officer.

Planned action: Approve the DROP purpose restriction and add the no-verification-contact rule to staff guidance.

Due date: 21 August 2026.

Source IDs: CA-DROP-FINAL-REGULATIONS, CA-DROP-DELETE-ACT.

Human decision boundary

- The organisation must make and document its own data broker and exemption assessment.
- The tool records evidence references supplied by the user. It does not inspect a live DROP account or verify that a control operated.
- No consumer identifiers or deletion lists should be entered into this preflight.
- Dates are operational prompts based on the recorded facts. Confirm any live deadline against the CPPA account and current official material.
- The preflight does not submit information to the CPPA or process a deletion request.

Official sources

Source	Provision	Date	Link
California Privacy Protection Agency: Delete Request and Opt-out Platform final regulations	California Code of Regulations, title 11, sections 7600 to 7616	31 July 2026	https://cppa.ca.gov/regulations/pdf/drop_ftr.pdf
California Privacy Protection Agency: Data Broker Registration Law and Delete Act statutory compilation	Civil Code sections 1798.99.80 to 1798.99.89	31 July 2026	https://cppa.ca.gov/regulations/pdf/data_broker_reg_delete_act_statute_eff_20260101.pdf
California Privacy Protection Agency: Data brokers and the Delete Request and Opt-out Platform		31 July 2026	https://cppa.ca.gov/data_brokers/