COMPLIANCE WORKING RECORD

California privacy risk assessment preflight

Redwood Mobility Services, Inc. (fictional sample). Assessment PRA-SAMPLE-2026-014. Record status: Draft.

Document control

Field	Value
Organization	Redwood Mobility Services, Inc. (fictional sample)
Document type	California privacy risk assessment preflight report
Document reference	PRA-SAMPLE-2026-014
Jurisdiction	United States
Version	1.0
Status	Draft
Classification	Internal compliance record
Prepared by	Chief Privacy Officer
Prepared on	August 6, 2026
Rule pack	california-pra-2026-10-09.1
Sources reviewed	July 31, 2026
Generated	August 6, 2026

Document control and scope

Field	Value
Organization	Redwood Mobility Services, Inc. (fictional sample)
Assessment reference	PRA-SAMPLE-2026-014
Accountable owner	Chief Privacy Officer
CCPA business confirmed	Yes, user confirmed
Selected triggers	Use ADMT for a significant decision; Process sensitive personal information
Processing start	September 15, 2026
Last formal review	August 5, 2026
Material change	None recorded
Rule pack	california-pra-2026-10-09.1

Assessment summary

The field records are structurally complete. 7 substantive findings remain open for human review.

Status	Count
Present	33
Missing	2
Uncertain	3
Conflicting	2
Not applicable	0
Open actions	7

Assessment timetable

- Risk-assessment rules effective: January 1, 2026. The supported final California risk-assessment rules took effect on this date.

- Processing start: September 15, 2026. The assessment should be completed before covered processing begins.

- ADMT-specific compliance begins: January 1, 2027. Separate supported ADMT provisions begin on this date.

- First 2026 to 2027 summary and attestation due: April 1, 2028. Section 7157. Regulator submission is separate from this internal record.

- Next periodic review no later than: August 5, 2029. Maximum supported three-year review interval. Review sooner when required.

Open action schedule

These fields require resolution or a documented human decision before the assessment is approved.

Retention by category

Status: Conflicting. Owner: Records Management Lead. Due date: August 21, 2026.

Planned action: Reconcile the two retention records and approve one category-specific period before pilot approval.

Evidence or rationale: PRA-014-DATA-01 records 90 days for inquiry text, while schedule RET-04 records 180 days for the same category.

Approximate consumer count

Status: Uncertain. Owner: Customer Analytics Manager. Due date: August 24, 2026.

Planned action: Reconcile web, application and telephone volumes and record the estimation method.

Evidence or rationale: PRA-014-VOL-01 estimates 42,000 annual inquiries, but excludes telephone contacts migrated from the legacy platform.

Likelihood and severity

Status: Uncertain. Owner: Privacy Risk Manager. Due date: August 26, 2026.

Planned action: Document the evidence and reasoning for every likelihood and severity rating, including risk R4.

Evidence or rationale: PRA-014-RISK-01 contains qualitative ratings, but the rationale for severity rating R4 is incomplete.

Residual risk

Status: Missing. Owner: Privacy Risk Manager. Due date: August 28, 2026.

Planned action: Assess residual risk after each linked safeguard and record any risk accepted or requiring further treatment.

Evidence or rationale: No approved residual-risk conclusion was located in PRA-014-CONTROL-01 or the decision record.

Human benefits-versus-risks decision

Status: Conflicting. Owner: Chief Privacy Officer. Due date: September 2, 2026.

Planned action: Resolve the conflicting records after the residual-risk analysis and document the authorized conclusion and reasoning.

Evidence or rationale: PRA-014-DEC-02 states that benefits outweigh risks, while meeting minutes GOV-17 defer that conclusion pending residual-risk analysis.

Decision-authority reviewer

Status: Missing. Owner: Corporate Secretary. Due date: September 4, 2026.

Planned action: Record the authorized decision participant, position, review date and approval evidence.

Evidence or rationale: The reviewer register does not yet evidence that a reviewer with authority to participate in the initiation decision completed review.

Review date evidence

Status: Uncertain. Owner: Privacy Program Manager. Due date: September 4, 2026.

Planned action: Record the completed review date after all reviewers and the authorized decision participant have signed.

Evidence or rationale: PRA-014-GOV-01 records circulation on August 5, 2026, but no completed formal review date.

Coverage and purpose

5 supported fields are recorded in this section.

Worker SPI exception analysis

Status: Present. Legal basis: 11 CCR section 7150(b)(1).

Evidence or rationale: PRA-014-WP-01, coverage memorandum, section 3. The worker-sensitive-information exception was reviewed and was not relied on.

Assessment note: The recorded status and evidence reference are retained for human review.

Specific purpose

Status: Present. Legal basis: 11 CCR section 7152(a)(1).

Evidence or rationale: PRA-014-DES-01, purpose statement, approved draft August 5, 2026: prioritize customer support inquiries for human triage.

Assessment note: The recorded status and evidence reference are retained for human review.

Personal-information categories

Status: Present. Legal basis: 11 CCR section 7152(a)(2).

Evidence or rationale: PRA-014-DATA-01, data inventory, rows 4 to 11: identifiers, inquiry text, account history and service interaction data.

Assessment note: The recorded status and evidence reference are retained for human review.

Sensitive-information categories

Status: Present. Legal basis: 11 CCR section 7152(a)(2).

Evidence or rationale: PRA-014-DATA-01, row 12, and minimisation note MN-08: precise geolocation and health information are excluded.

Assessment note: The recorded status and evidence reference are retained for human review.

Minimum-necessary analysis

Status: Present. Legal basis: 11 CCR section 7152(a)(3).

Evidence or rationale: PRA-014-MIN-02, necessity matrix, version 1.2, maps each retained field to the support-triage purpose.

Assessment note: The recorded status and evidence reference are retained for human review.

Data operations

13 supported fields are recorded in this section.

Collection methods

Status: Present. Legal basis: 11 CCR section 7152(a)(4).

Evidence or rationale: PRA-014-FLOW-01, data-flow diagram, nodes 1 to 4: web form, mobile application and contact-center entry.

Assessment note: The recorded status and evidence reference are retained for human review.

Use methods

Status: Present. Legal basis: 11 CCR section 7152(a)(4).

Evidence or rationale: PRA-014-FLOW-01, nodes 5 to 8, and OPS-22, triage operating procedure, sections 4 and 5.

Assessment note: The recorded status and evidence reference are retained for human review.

Disclosure methods

Status: Present. Legal basis: 11 CCR section 7152(a)(4).

Evidence or rationale: PRA-014-FLOW-01, nodes 9 and 10: encrypted API transfer to the contracted model host and ticketing provider.

Assessment note: The recorded status and evidence reference are retained for human review.

Other processing methods

Status: Present. Legal basis: 11 CCR section 7152(a)(4).

Evidence or rationale: PRA-014-ARCH-02, architecture record: tokenisation, classification, queue ranking, encrypted storage and deletion workflow.

Assessment note: The recorded status and evidence reference are retained for human review.

Information sources

Status: Present. Legal basis: 11 CCR section 7152(a)(5).

Evidence or rationale: PRA-014-DATA-01, source column: consumer submissions, service account records and derived queue-priority labels.

Assessment note: The recorded status and evidence reference are retained for human review.

Retention by category

Status: Conflicting. Legal basis: 11 CCR section 7152(a)(6).

Evidence or rationale: PRA-014-DATA-01 records 90 days for inquiry text, while schedule RET-04 records 180 days for the same category.

Owner: Records Management Lead. Due date: August 21, 2026.

Planned action: Reconcile the two retention records and approve one category-specific period before pilot approval.

Assessment note: The supplied records conflict. Resolve the conflict before the human decision.

Consumer interaction method

Status: Present. Legal basis: 11 CCR section 7152(a)(7).

Evidence or rationale: PRA-014-CX-01, consumer journey, steps 1 to 6: direct web, app and telephone support interactions.

Assessment note: The recorded status and evidence reference are retained for human review.

Interaction purpose

Status: Present. Legal basis: 11 CCR section 7152(a)(7).

Evidence or rationale: PRA-014-CX-01, purpose annotation: route inquiries to an appropriately trained support agent.

Assessment note: The recorded status and evidence reference are retained for human review.

Approximate consumer count

Status: Uncertain. Legal basis: 11 CCR section 7152(a)(8).

Evidence or rationale: PRA-014-VOL-01 estimates 42,000 annual inquiries, but excludes telephone contacts migrated from the legacy platform.

Owner: Customer Analytics Manager. Due date: August 24, 2026.

Planned action: Reconcile web, application and telephone volumes and record the estimation method.

Assessment note: The field remains uncertain and requires human review.

Disclosures

Status: Present. Legal basis: 11 CCR section 7152(a)(9).

Evidence or rationale: PRA-014-VEN-01, disclosure schedule, rows 1 and 2: hosted inference and support-ticket processing.

Assessment note: The recorded status and evidence reference are retained for human review.

Delivery methods

Status: Present. Legal basis: 11 CCR section 7152(a)(9).

Evidence or rationale: PRA-014-VEN-01, transfer method column: encrypted API and managed service connection.

Assessment note: The recorded status and evidence reference are retained for human review.

Recipient names or categories

Status: Present. Legal basis: 11 CCR section 7152(a)(9).

Evidence or rationale: PRA-014-VEN-01 identifies the contracted model host and support-ticket processor by legal name.

Assessment note: The recorded status and evidence reference are retained for human review.

Recipient purposes

Status: Present. Legal basis: 11 CCR section 7152(a)(9).

Evidence or rationale: PRA-014-VEN-01, purpose column, limits each recipient to hosted inference or ticket administration.

Assessment note: The recorded status and evidence reference are retained for human review.

ADMT detail

5 supported fields are recorded in this section.

ADMT logic

Status: Present. Legal basis: 11 CCR section 7152(a)(10).

Evidence or rationale: PRA-014-MODEL-01, model card, section 2, explains the text classification and queue-ranking logic in plain language.

Assessment note: The recorded status and evidence reference are retained for human review.

ADMT assumptions

Status: Present. Legal basis: 11 CCR section 7152(a)(10).

Evidence or rationale: PRA-014-MODEL-01, section 4: language coverage, inquiry-length and representative-training-data assumptions.

Assessment note: The recorded status and evidence reference are retained for human review.

ADMT limitations

Status: Present. Legal basis: 11 CCR section 7152(a)(10).

Evidence or rationale: PRA-014-MODEL-01, section 5: reduced reliability for mixed-language, highly abbreviated and novel inquiries.

Assessment note: The recorded status and evidence reference are retained for human review.

ADMT output

Status: Present. Legal basis: 11 CCR section 7152(a)(10).

Evidence or rationale: PRA-014-MODEL-01, section 3: category label, confidence band and suggested queue priority.

Assessment note: The recorded status and evidence reference are retained for human review.

Use in significant decision

Status: Present. Legal basis: 11 CCR section 7152(a)(10).

Evidence or rationale: PRA-014-DEC-01, decision-use note: no eligibility, employment, housing, credit, health or education decision is made; an agent reviews the queue.

Assessment note: The recorded status and evidence reference are retained for human review.

Benefits and negative impacts

10 supported fields are recorded in this section.

Benefits to the business

Status: Present. Legal basis: 11 CCR section 7152(a)(11).

Evidence or rationale: PRA-014-BEN-01, operational study, table 2: lower median routing time and fewer manual transfers during the controlled pilot.

Assessment note: The recorded status and evidence reference are retained for human review.

Benefits to consumers

Status: Present. Legal basis: 11 CCR section 7152(a)(11).

Evidence or rationale: PRA-014-BEN-01, table 3: faster routing to trained staff and fewer repeated explanations during the controlled pilot.

Assessment note: The recorded status and evidence reference are retained for human review.

Benefits to other stakeholders

Status: Present. Legal basis: 11 CCR section 7152(a)(11).

Evidence or rationale: PRA-014-BEN-01, section 4: support agents receive a consistent triage summary and retain override authority.

Assessment note: The recorded status and evidence reference are retained for human review.

Benefits to the public

Status: Present. Legal basis: 11 CCR section 7152(a)(11).

Evidence or rationale: PRA-014-BEN-01, section 5 records no separate public benefit claim for this activity.

Assessment note: The recorded status and evidence reference are retained for human review.

Negative-impact types

Status: Present. Legal basis: 11 CCR section 7152(a)(12).

Evidence or rationale: PRA-014-RISK-01, risk register, risks R1 to R7: delay, misrouting, inappropriate inference, loss of control and unequal service quality.

Assessment note: The recorded status and evidence reference are retained for human review.

Affected parties

Status: Present. Legal basis: 11 CCR section 7152(a)(12).

Evidence or rationale: PRA-014-RISK-01 identifies customers, prospective customers and support agents for each recorded risk.

Assessment note: The recorded status and evidence reference are retained for human review.

Source and cause

Status: Present. Legal basis: 11 CCR section 7152(a)(12).

Evidence or rationale: PRA-014-RISK-01, cause column links risks to training-data gaps, input ambiguity, automation bias and integration failure.

Assessment note: The recorded status and evidence reference are retained for human review.

Likelihood and severity

Status: Uncertain. Legal basis: 11 CCR section 7152(a)(12).

Evidence or rationale: PRA-014-RISK-01 contains qualitative ratings, but the rationale for severity rating R4 is incomplete.

Owner: Privacy Risk Manager. Due date: August 26, 2026.

Planned action: Document the evidence and reasoning for every likelihood and severity rating, including risk R4.

Assessment note: The field remains uncertain and requires human review.

Safeguards linked to impacts

Status: Present. Legal basis: 11 CCR section 7152(a)(13).

Evidence or rationale: PRA-014-CONTROL-01 maps human review, override, quality sampling, language testing and deletion controls to risks R1 to R7.

Assessment note: The recorded status and evidence reference are retained for human review.

Residual risk

Status: Missing. Legal basis: 11 CCR section 7152(a)(13).

Evidence or rationale: No approved residual-risk conclusion was located in PRA-014-CONTROL-01 or the decision record.

Owner: Privacy Risk Manager. Due date: August 28, 2026.

Planned action: Assess residual risk after each linked safeguard and record any risk accepted or requiring further treatment.

Assessment note: The field is recorded as missing and requires an owned action before review.

Decision and governance

7 supported fields are recorded in this section.

Human benefits-versus-risks decision

Status: Conflicting. Legal basis: 11 CCR section 7152(a)(14).

Evidence or rationale: PRA-014-DEC-02 states that benefits outweigh risks, while meeting minutes GOV-17 defer that conclusion pending residual-risk analysis.

Owner: Chief Privacy Officer. Due date: September 2, 2026.

Planned action: Resolve the conflicting records after the residual-risk analysis and document the authorized conclusion and reasoning.

Assessment note: The supplied records conflict. Resolve the conflict before the human decision.

Decision whether to initiate or continue

Status: Present. Legal basis: 11 CCR section 7152(a)(15).

Evidence or rationale: PRA-014-DEC-02, draft decision record: pilot approval only, subject to closure of the open actions in this preflight.

Assessment note: The recorded status and evidence reference are retained for human review.

Contributors

Status: Present. Legal basis: 11 CCR section 7152(a)(16).

Evidence or rationale: PRA-014-GOV-01 lists Privacy, Customer Operations, Data Science, Information Security, Legal and Procurement contributors.

Assessment note: The recorded status and evidence reference are retained for human review.

Reviewer names and positions

Status: Present. Legal basis: 11 CCR section 7152(a)(17).

Evidence or rationale: PRA-014-GOV-01 lists Morgan Lee, Privacy Counsel, and Jordan Patel, Director of Customer Operations, as reviewers.

Assessment note: The recorded status and evidence reference are retained for human review.

Approver names and positions

Status: Present. Legal basis: 11 CCR section 7152(a)(17).

Evidence or rationale: PRA-014-GOV-01 identifies the Chief Privacy Officer and Chief Operating Officer as proposed approvers.

Assessment note: The recorded status and evidence reference are retained for human review.

Decision-authority reviewer

Status: Missing. Legal basis: 11 CCR section 7152(a)(17).

Evidence or rationale: The reviewer register does not yet evidence that a reviewer with authority to participate in the initiation decision completed review.

Owner: Corporate Secretary. Due date: September 4, 2026.

Planned action: Record the authorized decision participant, position, review date and approval evidence.

Assessment note: The field is recorded as missing and requires an owned action before review.

Review date evidence

Status: Uncertain. Legal basis: 11 CCR section 7152(a)(18).

Evidence or rationale: PRA-014-GOV-01 records circulation on August 5, 2026, but no completed formal review date.

Owner: Privacy Program Manager. Due date: September 4, 2026.

Planned action: Record the completed review date after all reviewers and the authorized decision participant have signed.

Assessment note: The field remains uncertain and requires human review.

Official source register

Source	Provision	Official link
California Privacy Protection Agency: CCPA updates, cybersecurity audits, risk assessments, ADMT and insurance regulations	Not provided	https://cppa.ca.gov/regulations/ccpa_updates.html
California Privacy Protection Agency: Approved text of CCPA regulations	Risk assessments	https://cppa.ca.gov/regulations/pdf/ccpa_updates_cyber_risk_admt_appr_text.pdf
California Privacy Protection Agency: New regulations approved by Office of Administrative Law	Not provided	https://cppa.ca.gov/announcements/2025/20250923.html

Assumptions

- The user confirmed that the organization is a CCPA business for the assessed activity.

- User-confirmed trigger types: Use ADMT for a significant decision; Process sensitive personal information.

- Field statuses, evidence references, owners and actions were supplied by the user and were not independently verified.

Limitations

- This tool does not determine CCPA business status, exemptions or whether an activity is legally covered.

- This tool does not decide whether benefits outweigh privacy risks or whether safeguards are adequate.

- This tool does not submit an assessment summary or attestation to the California Privacy Protection Agency.

- A named person with appropriate authority must review the evidence and make the processing decision.