NIST IR 8477-Based Set Theory Relationship Mapping (STRM)

Reference Document: Secure Controls Framework (SCF) version 2025.1 https://securecontrolsframework.com/set-theory-relationship-mapping-strm/ STRM Guidance:

Focal Document:

California Consumer Privacy Act (CCPA) / California Privacy Rights Act (CPRA)

Focal Document URL: https://cppa.ca.gov/regulations/pdf/cppa_act.pdf Published STRM URL: https://securecontrolsframework.com/content/strm/scf-strm-us-state-ca-ccpa-cpra.pdf

FDE#	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF#	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
1798.100	General Duties of Businesses that Collect Personal Information	N/A	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.100(a)	N/A	A business that controls the collection of a consumer's personal information shall, at or before the point of collection, inform consumers of the following:	Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data	5	
1798.100(a)(1)	N/A	The categories of personal information to be collected and the purposes for which the categories of personal information are collected or used and whether that information is sold or shared. A business shall not collect additional categories of personal information or use personal information collected for additional purposes that are incompatible with the disclosed purpose for which the personal information was collected without providing the consumer with notice consistent with this section.	Functional	intersects with	Purpose Specification	PRI-02.1	Mechanisms exist to ensure the data privacy notice identifies the purpose(s) for which Personal Data (PD) is collected, received, processed, stored, transmitted, shared.	5	
1798.100(a)(1)	N/A	The categories of personal information to be collected and the purposes for which the categories of personal information are collected or used and whether that information is sold or shared. A business shall not collect additional categories of personal information or use personal information collected for additional purposes that are incompatible with the disclosed purpose for which the personal information was collected without providing the consumer with notice consistent with this section.	Functional	intersects with	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to minimize the collection of Personal Data (PD) to only what is adequate, relevant and limited to the purposes identified in the data privacy notice, including protections against collecting PD from minors without appropriate parental or legal guardian consent.	5	
1798.100(a)(2)	N/A	If the business collects sensitive personal information, the categories of sensitive personal information to be collected and the purposes for which the categories of sensitive personal information are collected or used, and whether that information is sold or shared. A business shall not collect additional categories of sensitive personal information or use sensitive personal information collected for additional purposes that are incompatible with the disclosed purpose for which the sensitive personal information was collected without providing the consumer with notice consistent with this section.	Functional	intersects with	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to minimize the collection of Personal Data (PD) to only what is adequate, relevant and limited to the purposes identified in the data privacy notice, including protections against collecting PD from minors without appropriate parental or legal guardian consent.	5	
1798.100(a)(2)	N/A	If the business collects sensitive personal information, the categories of sensitive personal information to be collected and the purposes for which the categories of sensitive personal information are collected or used, and whether that information is sold or shared. A business shall not collect additional categories of sensitive personal information or use sensitive personal information collected for additional purposes that are incompatible with the disclosed purpose for which the sensitive personal information was collected without providing the consumer with notice consistent with this section.	Functional	intersects with	Personal Data Categories	PRI-05.7	Mechanisms exist to define and implement data handling and protection requirements for specific categories of sensitive Personal Data (PD).	5	
1798.100(a)(3)	N/A	The length of time the business intends to retain each category of personal information, including sensitive personal information, or if that is not possible, the criteria used to determine that period provided that a business shall not retain a consumer's personal information or sensitive personal information for each disclosed purpose for which the personal information was collected for longer than is reasonably necessary for that disclosed purpose.	Functional	intersects with	Personal Data (PD) Retention & Disposal	PRI-05	Mechanisms exist to: (1) Retain Personal Data (PD), including metadata, for an organization-defined time period to fulfill the purpose(s) identified in the notice or as required by law; (2) Dispose of, destroys, erases, and/or anonymizes the PD, regardless of the method of storage; and (3) Use organization-defined techniques or methods to ensure secure deletion or destruction of PD (including originals, copies and archived records). Mechanisms exist to:	5	
1798.100(b)	N/A	A business that, acting as a third party, controls the collection of personal information about a consumer may satisfy its obligation under subdivision (a) by providing the required information prominently and conspicuously on the homepage of its internet website. In addition, if a business acting as a third party controls the collection of personal information about a consumer on its premises, including in a vehicle, then the business shall, at or before the point of collection, inform consumers as to the categories of personal information to be collected and the purposes for which the categories of personal information are used, and whether that personal information is sold, in a clear and conspicuous manner at the location.	Functional	intersects with	Data Privacy Notice	PRI-02	(1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
1798.100(b)	N/A	A business that, acting as a third party, controls the collection of personal information about a consumer may satisfy its obligation under subdivision (a) by providing the required information prominently and conspicuously on the homepage of its internet website. In addition, if a business acting as a third party controls the collection of personal information about a consumer on its premises, including in a vehicle, then the business shall, at or before the point of collection, inform consumers as to the categories of personal information to be collected and the purposes for which the categories of personal information are used, and whether that personal information is sold, in a clear and	Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
1798.100(c)	N/A	conspicuous manner at the location. A business' collection, use, retention, and sharing of a consumer's personal information shall be reasonably necessary and proportionate to achieve the purposes for which the personal information was collected or processed, or for another disclosed purpose that is compatible with the context in which the personal information was collected, and not further processed in a manner that is incompatible with those purposes.	Functional	subset of	Data Privacy Program	PRI-01	Mechanisms exist to facilitate the implementation and operation of data protection controls throughout the data lifecycle to ensure all forms of Personal Data (PD) are processed lawfully, fairly and transparently. Mechanisms exist to address the use of Personal Data (PD) for internal	10	
1798.100(c)	N/A	A business' collection, use, retention, and sharing of a consumer's personal information shall be reasonably necessary and proportionate to achieve the purposes for which the personal information was collected or processed, or for another disclosed purpose that is compatible with the context in which the personal information was collected, and not further processed in a manner that is incompatible with those purposes.	Functional	intersects with	Internal Use of Personal Data (PD) For Testing, Training and Research	PRI-05.1	testing, training and research that: (1) Takes measures to limit or minimize the amount of PD used for internal testing, training and research purposes; and (2) Authorizes the use of PD when such information is required for internal testing, training and research. Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, updating and/or sharing Personal Data (PD) to:	5	
1798.100(c)	N/A	A business' collection, use, retention, and sharing of a consumer's personal information shall be reasonably necessary and proportionate to achieve the purposes for which the personal information was collected or processed, or for another disclosed purpose that is compatible with the context in which the personal information was collected, and not further processed in a manner that is incompatible with those purposes.	Functional	intersects with	Usage Restrictions of Personal Data (PD)	PRI-05.4	(1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1798.100(d)	N/A	A business that collects a consumer's personal information and that sells that personal information to, or shares it with, a third party or that discloses it to a service provider or contractor for a business purpose shall enter into an agreement with the third party, service provider, or contractor, that:	Functional	intersects with	Information Sharing With Third Parties	PRI-07	Mechanisms exist to disclose Personal Data (PD) to third-parties only for the purposes identified in the data privacy notice and with the implicit or explicit consent of the data subject.	5	
1798.100(d)	N/A	A business that collects a consumer's personal information and that sells that personal information to, or shares it with, a third party or that discloses it to a service provider or contractor for a business purpose shall enter into an agreement with the third party, service provider, or contractor, that:	Functional	intersects with	Data Privacy Requirements for Contractors & Service	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
1798.100(d)	N/A	A business that collects a consumer's personal information and that sells that personal information to, or shares it with, a third party or that discloses it to a service provider or contractor for a business purpose shall enter into an agreement with the third party, service provider, or contractor, that:	Functional	intersects with	Providers Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
1798.100(d)(1)	N/A	Specifies that the personal information is sold or disclosed by the business only for limited and specified purposes.	Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
1798.100(d)(2)	N/A	Obligates the third party, service provider, or contractor to comply with applicable obligations under this title and obligate those persons to provide the same level of privacy protection as is required by this title.	Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
1798.100(d)(3)	N/A	Grants the business rights to take reasonable and appropriate steps to help ensure that the third party, service provider, or contractor uses the personal information transferred in a manner consistent with the business' obligations under this title.	Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
1798.100(d)(4)	N/A	Requires the third party, service provider, or contractor to notify the business if it makes a determination that it can no longer meet its obligations under this title.	Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
1798.100(d)(5)	N/A	Grants the business the right, upon notice, including under paragraph (4), to take reasonable and appropriate steps to stop and remediate unauthorized use of personal information.	Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
1798.100(e)	N/A	A business that collects a consumer's personal information shall implement reasonable security procedures and practices appropriate to the nature of the personal information to protect the personal information from unauthorized or illegal access, destruction, use, modification, or disclosure in accordance with Section 1798.81.5.	Functional	subset of	Data Privacy Program	PRI-01	Mechanisms exist to facilitate the implementation and operation of data protection controls throughout the data lifecycle to ensure all forms of Personal Data (PD) are processed lawfully, fairly and transparently. Mechanisms exist to ensure Personal Data (PD) is protected by logical	10	
1798.100(e)	N/A	A business that collects a consumer's personal information shall implement reasonable security procedures and practices appropriate to the nature of the personal information to protect the personal information from unauthorized or illegal access, destruction, use, modification, or disclosure in accordance with Section 1798.81.5.	Functional	intersects with	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD. Mechanisms exist to facilitate the implementation of industry-	5	
1798.100(e)	N/A	A business that collects a consumer's personal information shall implement reasonable security procedures and practices appropriate to the nature of the personal information to protect the personal information from unauthorized or illegal access, destruction, use, modification, or disclosure in accordance with Section 1798.81.5. Nothing in this section shall require a business to disclose trade secrets, as specified in regulations adopted	Functional	subset of	Secure Engineering Principles	SEA-01	recognized cybersecurity & data privacy practices in the specification, design, development, implementation and modification of systems and services.	10	
1798.100(f)	N/A	pursuant to paragraph (3) of subdivision (a) of Section 1798.185.	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.



Secure Controls Framework (SCF) 1 of 9

FDE#	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF#	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes (optional)
1798.105	Consumers' Right to Delete Personal	N/A	Functional	no relationship	N/A	N/A	N/A	(optional) N/A	No requirements to map to.
1798.105(a)	Information N/A	A consumer shall have the right to request that a business delete any personal information about the consumer which the business has collected from the consumer.	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.105(b)	N/A	A business that collects personal information about consumers shall disclose, pursuant to Section 1798.130, the consumer's rights to request the deletion of the consumer's personal information.	Functional	intersects with	·	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
1798.105(c)	N/A	N/A A business that receives a verifiable consumer request from a consumer to delete the consumer's personal information pursuant to subdivision (a) of this section shall delete the consumer's personal information from its	Functional	no relationship	N/A	N/A	N/A Mechanisms exist to maintain a process to erase a data subject's Personal Data (PD), in accordance with applicable laws, regulations	N/A	No requirements to map to.
1798.105(c)(1)	N/A	records, notify any service providers or contractors to delete the consumer's personal information from their records, and notify all third parties to whom the business has sold or shared the personal information to delete the consumer's personal information unless this proves impossible or involves disproportionate effort.	Functional	intersects with	Right to Erasure	PRI-06.5	and contractual obligations pertaining to the retention of their PD.	5	
1798.105(c)(1)	N/A	A business that receives a verifiable consumer request from a consumer to delete the consumer's personal information pursuant to subdivision (a) of this section shall delete the consumer's personal information from its records, notify any service providers or contractors to delete the consumer's personal information from their records, and notify all third parties to whom the business has sold or shared the personal information to delete the consumer's personal information unless this proves impossible or involves disproportionate effort.	Functional	intersects with	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
1798.105(c)(1)	N/A	A business that receives a verifiable consumer request from a consumer to delete the consumer's personal information pursuant to subdivision (a) of this section shall delete the consumer's personal information from its records, notify any service providers or contractors to delete the consumer's personal information from their records, and notify all third parties to whom the business has sold or shared the personal information to delete the consumer's personal information unless this proves impossible or involves disproportionate effort. A business that receives a verifiable consumer request from a consumer to delete the consumer's personal	Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data. Mechanisms exist to ensure cybersecurity & data privacy requirements	5	
1798.105(c)(1)	N/A	information pursuant to subdivision (a) of this section shall delete the consumer's personal information from its records, notify any service providers or contractors to delete the consumer's personal information from their records, and notify all third parties to whom the business has sold or shared the personal information to delete the consumer's personal information unless this proves impossible or involves disproportionate effort.	Functional	intersects with	Contract Flow-Down Requirements	TPM-05.2	are included in contracts that flow-down to applicable sub-contractors and suppliers.	5	
1798.105(c)(2)	N/A	The business may maintain a confidential record of deletion requests solely for the purpose of preventing the personal information of a consumer who has submitted a deletion request from being sold, for compliance with laws or for other purposes, solely to the extent permissible under this title.	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.105(c)(3)	N/A	A service provider or contractor shall cooperate with the business in responding to a verifiable consumer request, and at the direction of the business, shall delete, or enable the business to delete and shall notify any of its own service providers or contractors to delete personal information about the consumer collected, used, processed, or retained by the service provider or the contractor. The service provider or contractor shall notify any service providers, contractors, or third parties who may have accessed personal information from or through the service provider or contractor, unless the information was accessed at the direction of the business, to delete the consumer's personal information unless this proves impossible or involves disproportionate effort. A service provider or contractor shall not be required to comply with a deletion request submitted by the consumer directly to the service provider or contractor to the extent that the service provider or contractor has collected, used, processed, or retained the consumer's personal information in its role as a service provider or contractor to the	Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
1798.105(c)(3)	N/A	A service provider or contractor shall cooperate with the business in responding to a verifiable consumer request, and at the direction of the business, shall delete, or enable the business to delete and shall notify any of its own service providers or contractors to delete personal information about the consumer collected, used, processed, or retained by the service provider or the contractor. The service provider or contractor shall notify any service providers, contractors, or third parties who may have accessed personal information from or through the service provider or contractor, unless the information was accessed at the direction of the business, to delete the consumer's personal information unless this proves impossible or involves disproportionate effort. A service provider or contractor shall not be required to comply with a deletion request submitted by the consumer directly to the service provider or contractor to the extent that the service provider or contractor has collected, used, processed, or retained the consumer's personal information in its role as a service provider or contractor to the	Functional	intersects with	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
1798.105(d)	N/A	business. A business, or a service provider or contractor acting pursuant to its contract with the business, another service provider, or another contractor, shall not be required to comply with a consumer's request to delete the consumer's personal information if it is reasonably necessary for the business, service provider, or contractor to maintain the consumer's personal information in order to:	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.105(d)(1)	N/A	Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by the consumer, or reasonably anticipated by the consumer within the context of a business' ongoing business relationship with the consumer, or otherwise perform a contract between the business and the consumer.	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.105(d)(2) 1798.105(d)(3)	N/A N/A	Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes. Debug to identify and repair errors that impair existing intended functionality.	Functional Functional	no relationship	N/A N/A	N/A N/A	N/A N/A	N/A N/A	No requirements to map to. No requirements to map to.
1798.105(d)(4)	N/A	Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law. Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with	Functional	no relationship		N/A	N/A	N/A	No requirements to map to.
1798.105(d)(5) 1798.105(d)(6)	N/A N/A	Section 1546) of Title 12 of Part 2 of the Penal Code. Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when the business' deletion of the information is likely to render impossible or	Functional Functional	no relationship		N/A N/A	N/A N/A	N/A N/A	No requirements to map to. No requirements to map to.
1798.105(d)(7)	N/A	seriously impair the ability to complete such research, if the consumer has provided informed consent. To enable solely internal uses that are reasonably aligned with the expectations of the consumer based on the consumer's relationship with the business and compatible with the context in which the consumer provided the	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.105(d)(7)	N/A	information. Comply with a legal obligation.	Functional	no relationship		N/A	N/A	N/A	No requirements to map to.
1798.106	Consumers' Right to Correct Inaccurate	N/A	Functional	no relationship		N/A	N/A	N/A	No requirements to map to.
1798.106(a)	Personal Information N/A	A consumer shall have the right to request a business that maintains inaccurate personal information about the consumer to correct that inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.	Functional	intersects with	Data Subject	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.106(b)	N/A	A business that collects personal information about consumers shall disclose, pursuant to Section 1798.130, the consumer's right to request correction of inaccurate personal information.	Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	



Secure Controls Framework (SCF) 2 of 9

FDE#	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF#	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes (optional)
1798.106(c)	N/A	A business that receives a verifiable consumer request to correct inaccurate personal information shall use commercially reasonable efforts to correct the inaccurate personal information as directed by the consumer, pursuant to Section 1798.130 and regulations adopted pursuant to paragraph (7) of subdivision (a) of Section 1798.185.	Functional	intersects with	Correcting Inaccurate Personal Data	PRI-06.1	Mechanisms exist to establish and implement a process for: (1) Data subjects to have inaccurate Personal Data (PD) maintained by the organization corrected or amended; and (2) Disseminating corrections or amendments of PD to other authorized users of the PD.	(optional) 5	
	Consumers' Right to Know What Personal Information is Being Collected. Right to Access Personal	N/A	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.110(a)	Information N/A	A consumer shall have the right to request that a business that collects personal information about the consumer disclose to the consumer the following:	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.110(a)(1)	N/A	The categories of personal information it has collected about that consumer.	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.110(a)(2)	N/A	The categories of sources from which the personal information is collected.	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.110(a)(3)	N/A	The business or commercial purpose for collecting, selling, or sharing personal information.	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.110(a)(4)	N/A	The categories of third parties to whom the business discloses personal information.	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.110(a)(5)	N/A	The specific pieces of personal information it has collected about that consumer. A business that collects personal information about a consumer shall disclose to the consumer, pursuant to	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD. Mechanisms exist to provide data subjects with an accounting of disclosures of their Personal Data (PD) controlled by:	5	
1798.110(b)	N/A	subparagraph (B) of paragraph (3) of subdivision (a) of Section 1798.130, the information specified in subdivision (a) upon receipt of a verifiable consumer request from the consumer, provided that a business shall be deemed to be in compliance with paragraphs (1) to (4), inclusive, of subdivision (a) to the extent that the categories of information and the business or commercial purpose for collecting, selling, or sharing personal information it would be required to disclose to the consumer pursuant to paragraphs (1) to (4), inclusive, of subdivision (a) is the same as the information it has disclosed pursuant to paragraphs (1) to (4), inclusive, of subdivision (c).	Functional	intersects with	Accounting of Disclosures	PRI-14.1	(1) The organization; and/or (2) Relevant third-parties that their PD was shared with.	5	
1798.110(c)	N/A	A business that collects personal information about consumers shall disclose, pursuant to subparagraph (B) of paragraph (5) of subdivision (a) of Section 1798.130:	Functional	no relationship		N/A	N/A Mechanisms exist to provide data subjects with an accounting of	N/A	No requirements to map to.
1798.110(c)(1)	N/A	The categories of personal information it has collected about consumers.	Functional	intersects with	Accounting of Disclosures	PRI-14.1	disclosures of their Personal Data (PD) controlled by: (1) The organization; and/or (2) Relevant third-parties that their PD was shared with. Mechanisms exist to provide data subjects with an accounting of	5	
1798.110(c)(2)	N/A	The categories of sources from which the personal information is collected.	Functional	intersects with	Accounting of Disclosures	PRI-14.1	disclosures of their Personal Data (PD) controlled by: (1) The organization; and/or (2) Relevant third-parties that their PD was shared with. Mechanisms exist to provide data subjects with an accounting of	5	
1798.110(c)(3)	N/A	The business or commercial purpose for collecting, selling, or sharing personal information.	Functional	intersects with	Accounting of Disclosures	PRI-14.1	disclosures of their Personal Data (PD) controlled by: (1) The organization; and/or (2) Relevant third-parties that their PD was shared with. Mechanisms exist to provide data subjects with an accounting of	5	
1798.110(c)(4)	N/A	The categories of third parties to whom the business discloses personal information.	Functional	intersects with	Accounting of Disclosures	PRI-14.1	disclosures of their Personal Data (PD) controlled by: (1) The organization; and/or (2) Relevant third-parties that their PD was shared with. Mechanisms exist to provide data subjects with an accounting of	5	
1798.110(c)(5)	N/A Consumers' Right to	That a consumer has the right to request the specific pieces of personal information the business has collected about that consumer.	Functional	intersects with	Accounting of Disclosures	PRI-14.1	disclosures of their Personal Data (PD) controlled by: (1) The organization; and/or (2) Relevant third-parties that their PD was shared with.	5	
1798.115	Know What Personal Information is Sold or Shared and to Whom	N/A	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.



Secure Controls Framework (SCF) 3 of 9

FDE#	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF#	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes (optional)
1798.115(a)	N/A	A consumer shall have the right to request that a business that sells or shares the consumer's personal information, or that discloses it for a business purpose, disclose to that consumer:	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	(optional)	
1798.115(a)(1)	N/A	The categories of personal information that the business collected about the consumer.	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.115(a)(2)	N/A	The categories of personal information that the business sold or shared about the consumer and the categories of third parties to whom the personal information was sold or shared, by category or categories of personal information for each category of third parties to whom the personal information was sold or shared.	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.115(a)(3)	N/A	The categories of personal information that the business disclosed about the consumer for a business purpose and the categories of persons to whom it was disclosed for a business purpose.	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.115(b)	N/A	A business that sells or shares personal information about a consumer, or that discloses a consumer's personal information for a business purpose, shall disclose, pursuant to paragraph (4) of subdivision (a) of Section 1798.130, the information specified in subdivision (a) to the consumer upon receipt of a verifiable consumer request from the consumer.	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.115(c)	N/A	A business that sells or shares consumers' personal information, or that discloses consumers' personal information for a business purpose, shall disclose, pursuant to subparagraph (C) of paragraph (5) of subdivision (a)	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.115(c)(1)	N/A	of Section 1798.130: The category or categories of consumers' personal information it has sold or shared, or if the business has not sold or shared consumers' personal information, it shall disclose that fact.	Functional	intersects with	Accounting of Disclosures	PRI-14.1	Mechanisms exist to provide data subjects with an accounting of disclosures of their Personal Data (PD) controlled by: (1) The organization; and/or	5	
1798.115(c)(2)	N/A	The category or categories of consumers' personal information it has disclosed for a business purpose, or if the business has not disclosed consumers' personal information for a business purpose, it shall disclose that fact.	Functional	intersects with	Accounting of Disclosures	PRI-14.1	(2) Relevant third-parties that their PD was shared with. Mechanisms exist to provide data subjects with an accounting of disclosures of their Personal Data (PD) controlled by: (1) The organization; and/or	5	
1798.115(d)	N/A	A third party shall not sell or share personal information about a consumer that has been sold to, or shared with, the third party by a business unless the consumer has received explicit notice and is provided an opportunity to exercise the right to opt-out pursuant to Section 1798.120.	Functional	intersects with	Prohibition of Selling, Processing and/or Sharing Personal Data (PD)	PRI-03.3	(2) Relevant third-parties that their PD was shared with. Mechanisms exist to prevent the sale, processing and/or sharing of Personal Data (PD) when: (1) Instructed by the data subject; or (2) The data subject is a minor, where selling and/or sharing PD is legally prohibited.	5	
1798.120	Consumers' Right to Opt Out of Sale or Sharing of Personal Information		Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.120(a)		A consumer shall have the right, at any time, to direct a business that sells or shares personal information about the consumer to third parties not to sell or share the consumer's personal information. This right may be referred to as the right to opt-out of sale or sharing.	Functional	intersects with	Continued Use of Personal Data (PD)	PRI-03.9	Mechanisms exist to govern the continued use of Personal Data (PD) as it is collected, received, processed, stored, transmitted and/or shared until: (1) Disposal of PD occurs when there is no longer a legitimate business purpose; (2) Disposal of PD occurs when the data retention timeline for the use case is met; and/or (3) Continued use of PD is prohibited upon withdrawal of data subject	5	
1798.120(a)	N/A	A consumer shall have the right, at any time, to direct a business that sells or shares personal information about the consumer to third parties not to sell or share the consumer's personal information. This right may be referred to as the right to opt-out of sale or sharing.	Functional	intersects with	Cease Processing, Storing and/or Sharing Personal Data (PD)	PRI-03.10	Mechanisms exist to ensure the organization ceases collecting, receiving, processing, storing, transmitting, updating and/or sharing Personal Data (PD) upon receiving a data subject's consent revocation. Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first	5	
1798.120(b)	N/A	A business that sells consumers' personal information to, or shares it with, third parties shall provide notice to consumers, pursuant to subdivision (a) of Section 1798.135, that this information may be sold or shared and that consumers have the "right to opt-out" of the sale or sharing of their personal information.	Functional	intersects with	Data Privacy Notice	PRI-02	(1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
1798.120(c)	NI/A	Notwithstanding subdivision (a), a business shall not sell or share the personal information of consumers if the business has actual knowledge that the consumer is less than 16 years of age, unless the consumer, in the case of consumers at least 13 years of age and less than 16 years of age, or the consumer's parent or guardian, in the case of consumers who are less than 13 years of age, has affirmatively authorized the sale or sharing of the consumer's personal information. A business that willfully disregards the consumer's age shall be deemed to have had actual knowledge of the consumer's age.	Functional	intersects with	Prohibition of Selling, Processing and/or Sharing Personal Data (PD)	PRI-03.3	Mechanisms exist to prevent the sale, processing and/or sharing of Personal Data (PD) when: (1) Instructed by the data subject; or (2) The data subject is a minor, where selling and/or sharing PD is legally prohibited.	5	
1798.120(d)	N/A	A business that has received direction from a consumer not to sell or share the consumer's personal information or, in the case of a minor consumer's personal information has not received consent to sell or share the minor consumer's personal information, shall be prohibited, pursuant to paragraph (4) of subdivision (c) of Section 1798.135, from selling or sharing the consumer's personal information after its receipt of the consumer's direction, unless the consumer subsequently provides consent, for the sale or sharing of the consumer's personal information.	Functional	intersects with	Prohibition of Selling, Processing and/or Sharing Personal Data (PD)	PRI-03.3	Mechanisms exist to prevent the sale, processing and/or sharing of Personal Data (PD) when: (1) Instructed by the data subject; or (2) The data subject is a minor, where selling and/or sharing PD is legally prohibited.	5	



Secure Controls Framework (SCF) 4 of 9

FDE#	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF#	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
1798.121	Consumers' Right to Limit Use and Disclosure of Sensitive Personal	N/A	Functional	no relationship	N/A	N/A	N/A		No requirements to map to.
1798.121(a)	Information N/A	A consumer shall have the right, at any time, to direct a business that collects sensitive personal information about the consumer to limit its use of the consumer's sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, to perform the services set forth in paragraphs (2), (4), (5), and (8) of subdivision (e) of Section 1798.140, and as authorized by regulations adopted pursuant to subparagraph (C) of paragraph (18) of subdivision (a) of Section 1798.185. A business that uses or discloses a consumer's sensitive personal information for purposes other than those specified in this subdivision shall provide notice to consumers, pursuant to subdivision (a) of Section 1798.135, that this information may be used, or disclosed to a service provider or contractor, for additional, specified purposes and that consumers have the right to limit the use or disclosure of their sensitive personal information.	Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
1798.121(a)	N/A	A consumer shall have the right, at any time, to direct a business that collects sensitive personal information about the consumer to limit its use of the consumer's sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, to perform the services set forth in paragraphs (2), (4), (5), and (8) of subdivision (e) of Section 1798.140, and as authorized by regulations adopted pursuant to subparagraph (C) of paragraph (18) of subdivision (a) of Section 1798.185. A business that uses or discloses a consumer's sensitive personal information for purposes other than those specified in this subdivision shall provide notice to consumers, pursuant to subdivision (a) of Section 1798.135, that this information may be used, or disclosed to a service provider or contractor, for additional, specified purposes and that consumers have the right to limit the use or disclosure of their sensitive personal information.	Functional	intersects with	Choice & Consent	PRI-03	Mechanisms exist to enable data subjects to authorize the collection, processing, storage, sharing, updating and disposal of their Personal Data (PD), where prior to collection the data subject is provided with: (1) Plain language to illustrate the potential data privacy risks of the authorization; (2) A means for users to decline the authorization; and (3) All necessary choice and consent-related criteria required by applicable statutory, regulatory and contractual obligations.	5	
1798.121(a)	N/A	A consumer shall have the right, at any time, to direct a business that collects sensitive personal information about the consumer to limit its use of the consumer's sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, to perform the services set forth in paragraphs (2), (4), (5), and (8) of subdivision (e) of Section 1798.140, and as authorized by regulations adopted pursuant to subparagraph (C) of paragraph (18) of subdivision (a) of Section 1798.185. A business that uses or discloses a consumer's sensitive personal information for purposes other than those specified in this subdivision shall provide notice to consumers, pursuant to subdivision (a) of Section 1798.135, that this information may be used, or disclosed to a service provider or contractor, for additional, specified purposes and that consumers have the right to limit the use or disclosure of their sensitive personal information.	Functional	intersects with	Just-In-Time Notice & Updated Consent	PRI-03.2	Mechanisms exist to present data subjects with a new or updated consent request to process, store and/or share Personal Data (PD) in conjunction with the data action, when: (1) The original circumstances under which an individual gave consent have changed; or (2) A significant amount of time has passed since an individual gave consent.	5	
1798.121(a)	N/A	A consumer shall have the right, at any time, to direct a business that collects sensitive personal information about the consumer to limit its use of the consumer's sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, to perform the services set forth in paragraphs (2), (4), (5), and (8) of subdivision (e) of Section 1798.140, and as authorized by regulations adopted pursuant to subparagraph (C) of paragraph (18) of subdivision (a) of Section 1798.185. A business that uses or discloses a consumer's sensitive personal information for purposes other than those specified in this subdivision shall provide notice to consumers, pursuant to subdivision (a) of Section 1798.135, that this information may be used, or disclosed to a service provider or contractor, for additional, specified purposes and that consumers have the right to limit the use or disclosure of their sensitive personal information.	Functional	intersects with	Continued Use of Personal Data (PD)	PRI-03.9	Mechanisms exist to govern the continued use of Personal Data (PD) as it is collected, received, processed, stored, transmitted and/or shared until: (1) Disposal of PD occurs when there is no longer a legitimate business purpose; (2) Disposal of PD occurs when the data retention timeline for the use case is met; and/or (3) Continued use of PD is prohibited upon withdrawal of data subject consent.	5	
1798.121(a)	N/A	A consumer shall have the right, at any time, to direct a business that collects sensitive personal information about the consumer to limit its use of the consumer's sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, to perform the services set forth in paragraphs (2), (4), (5), and (8) of subdivision (e) of Section 1798.140, and as authorized by regulations adopted pursuant to subparagraph (C) of paragraph (18) of subdivision (a) of Section 1798.185. A business that uses or discloses a consumer's sensitive personal information for purposes other than those specified in this subdivision shall provide notice to consumers, pursuant to subdivision (a) of Section 1798.135, that this information may be used, or disclosed to a service provider or contractor, for additional, specified purposes and that consumers have the right to limit the use or disclosure of their sensitive personal information.	Functional	intersects with	Cease Processing, Storing and/or Sharing Personal Data (PD)	PRI-03.10	Mechanisms exist to ensure the organization ceases collecting, receiving, processing, storing, transmitting, updating and/or sharing Personal Data (PD) upon receiving a data subject's consent revocation.	5	
1798.121(a)	N/A	A consumer shall have the right, at any time, to direct a business that collects sensitive personal information about the consumer to limit its use of the consumer's sensitive personal information to that use which is necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services, to perform the services set forth in paragraphs (2), (4), (5), and (8) of subdivision (e) of Section 1798.140, and as authorized by regulations adopted pursuant to subparagraph (C) of paragraph (18) of subdivision (a) of Section 1798.185. A business that uses or discloses a consumer's sensitive personal information for purposes other than those specified in this subdivision shall provide notice to consumers, pursuant to subdivision (a) of Section 1798.135, that this information may be used, or disclosed to a service provider or contractor, for additional, specified purposes and that consumers have the right to limit the use or disclosure of their sensitive personal information.	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.121(b)	N/A	A business that has received direction from a consumer not to use or disclose the consumer's sensitive personal information, except as authorized by subdivision (a), shall be prohibited, pursuant to paragraph (4) of subdivision (c) of Section 1798.135, from using or disclosing the consumer's sensitive personal information for any other purpose after its receipt of the consumer's direction unless the consumer subsequently provides consent for the use or disclosure of the consumer's sensitive personal information for additional purposes. A business that has received direction from a consumer not to use or disclose the consumer's sensitive personal	Functional	intersects with	Prohibition of Selling, Processing and/or Sharing Personal Data (PD)	PRI-03.3	Mechanisms exist to prevent the sale, processing and/or sharing of Personal Data (PD) when: (1) Instructed by the data subject; or (2) The data subject is a minor, where selling and/or sharing PD is legally prohibited. Mechanisms exist to govern the continued use of Personal Data (PD) as it is collected, received, processed, stored, transmitted and/or shared until:	5	
1798.121(b)	N/A	information, except as authorized by subdivision (a), shall be prohibited, pursuant to paragraph (4) of subdivision (c) of Section 1798.135, from using or disclosing the consumer's sensitive personal information for any other purpose after its receipt of the consumer's direction unless the consumer subsequently provides consent for the use or disclosure of the consumer's sensitive personal information for additional purposes.	Functional	intersects with	Continued Use of Personal Data (PD)	PRI-03.9	 (1) Disposal of PD occurs when there is no longer a legitimate business purpose; (2) Disposal of PD occurs when the data retention timeline for the use case is met; and/or (3) Continued use of PD is prohibited upon withdrawal of data subject consent. 	5	
1798.121(b)	N/A	A business that has received direction from a consumer not to use or disclose the consumer's sensitive personal information, except as authorized by subdivision (a), shall be prohibited, pursuant to paragraph (4) of subdivision (c) of Section 1798.135, from using or disclosing the consumer's sensitive personal information for any other purpose after its receipt of the consumer's direction unless the consumer subsequently provides consent for the use or disclosure of the consumer's sensitive personal information for additional purposes. A service provider or contractor that assists a business in performing the purposes authorized by subdivision (a) may not use the sensitive personal information after it has received instructions from the business and to the extent it	Functional	intersects with	Cease Processing, Storing and/or Sharing Personal Data (PD)	PRI-03.10	Mechanisms exist to ensure the organization ceases collecting, receiving, processing, storing, transmitting, updating and/or sharing Personal Data (PD) upon receiving a data subject's consent revocation. Mechanisms exist to disclose Personal Data (PD) to third-parties only for the purposes identified in the data privacy notice and with the	5	
1798.121(c)	N/A	has actual knowledge that the personal information is sensitive personal information for any other purpose. A service provider or contractor is only required to limit its use of sensitive personal information received pursuant to a written contract with the business in response to instructions from the business and only with respect to its relationship with that business.		intersects with	Information Sharing With Third Parties	PRI-07	implicit or explicit consent of the data subject.	5	
1798.121(c)	N/A	A service provider or contractor that assists a business in performing the purposes authorized by subdivision (a) may not use the sensitive personal information after it has received instructions from the business and to the extent it has actual knowledge that the personal information is sensitive personal information for any other purpose. A service provider or contractor is only required to limit its use of sensitive personal information received pursuant to a written contract with the business in response to instructions from the business and only with respect to its relationship with that business.	Functional	intersects with	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
1798.121(c)	N/A	A service provider or contractor that assists a business in performing the purposes authorized by subdivision (a) may not use the sensitive personal information after it has received instructions from the business and to the extent it has actual knowledge that the personal information is sensitive personal information for any other purpose. A service provider or contractor is only required to limit its use of sensitive personal information received pursuant to a written contract with the business in response to instructions from the business and only with respect to its relationship with that business.	Functional	intersects with	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity & data privacy requirements with third-parties, reflecting the organization's needs to protect its systems, processes and data.	5	
1798.121(c)	N/A	A service provider or contractor that assists a business in performing the purposes authorized by subdivision (a) may not use the sensitive personal information after it has received instructions from the business and to the extent it has actual knowledge that the personal information is sensitive personal information for any other purpose. A service provider or contractor is only required to limit its use of sensitive personal information received pursuant to a written contract with the business in response to instructions from the business and only with respect to its relationship with that business.	Functional	intersects with	Contract Flow-Down Requirements	TPM-05.2	Mechanisms exist to ensure cybersecurity & data privacy requirements are included in contracts that flow-down to applicable sub-contractors and suppliers.	5	
1798.121(d)	N/A	Sensitive personal information that is collected or processed without the purpose of inferring characteristics about a consumer is not subject to this section, as further defined in regulations adopted pursuant to subparagraph (C) of paragraph (18) of subdivision (a) of Section 1798.185, and shall be treated as personal information for purposes of all other sections of this act, including Section 1798.100.	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.125	Consumers' Right of No Retaliation Following Op Out or Exercise of Other Rights		Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.125(a)	N/A	N/A	Functional	no relationship	N/A	N/A	N/A Mechanisms exist to prevent discrimination against a data subject for exercising their legal rights portaining to medifying acceptant.	N/A	No requirements to map to.
1798.125(a)(1)	N/A	A business shall not discriminate against a consumer because the consumer exercised any of the consumer's rights under this title, including, but not limited to, by:	Functional	intersects with	Product or Service Delivery Restrictions	PRI-03.5	exercising their legal rights pertaining to modifying or revoking consent, including prohibiting: (1) Refusing products and/or services; (2) Charging different rates for goods and/or services; and (3) Providing different levels of quality. Mechanisms exist to prevent discrimination against a data subject for	5	
1798.125(a)(1)(A)	N/A	Denying goods or services to the consumer.	Functional	intersects with	Product or Service Delivery Restrictions	PRI-03.5	exercising their legal rights pertaining to modifying or revoking consent, including prohibiting: (1) Refusing products and/or services; (2) Charging different rates for goods and/or services; and (3) Providing different levels of quality.	5	



Secure Controls Framework (SCF) 5 of 9

	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF#	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
1798.125(a)(1)(B)	N/A	Charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties.	Functional	intersects with	Product or Service Delivery Restrictions		Mechanisms exist to prevent discrimination against a data subject for exercising their legal rights pertaining to modifying or revoking consent, including prohibiting: (1) Refusing products and/or services; (2) Charging different rates for goods and/or services; and	5	
1798.125(a)(1)(C)	N/A	Providing a different level or quality of goods or services to the consumer.	Functional	intersects with	Product or Service Delivery Restrictions		(3) Providing different levels of quality. Mechanisms exist to prevent discrimination against a data subject for exercising their legal rights pertaining to modifying or revoking consent, including prohibiting: (1) Refusing products and/or services; (2) Charging different rates for goods and/or services; and (3) Providing different levels of quality.	5	
1798.125(a)(1)(D)	N/A	Suggesting that the consumer will receive a different price or rate for goods or services or a different level or quality of goods or services.	Functional	intersects with	Product or Service Delivery Restrictions	1	Mechanisms exist to prevent discrimination against a data subject for exercising their legal rights pertaining to modifying or revoking consent, including prohibiting: (1) Refusing products and/or services; (2) Charging different rates for goods and/or services; and (3) Providing different levels of quality.	5	
1798.125(a)(1)(E)	N/A	Retaliating against an employee, applicant for employment, or independent contractor, as defined in subparagraph (A) of paragraph (2) of subdivision (m) of Section 1798.145, for exercising their rights under this title.	Functional	intersects with	Product or Service Delivery Restrictions	1	Mechanisms exist to prevent discrimination against a data subject for exercising their legal rights pertaining to modifying or revoking consent, including prohibiting: (1) Refusing products and/or services; (2) Charging different rates for goods and/or services; and (3) Providing different levels of quality.	5	
1798.125(a)(2)	N/A	Nothing in this subdivision prohibits a business, pursuant to subdivision (b), from charging a consumer a different price or rate, or from providing a different level or quality of goods or services to the consumer, if that difference is reasonably related to the value provided to the business by the consumer's data.	Functional	intersects with	Product or Service Delivery Restrictions		Mechanisms exist to prevent discrimination against a data subject for exercising their legal rights pertaining to modifying or revoking consent, including prohibiting: (1) Refusing products and/or services; (2) Charging different rates for goods and/or services; and (3) Providing different levels of quality.	5	
1798.125(a)(3)	N/A	This subdivision does not prohibit a business from offering loyalty, rewards, premium features, discounts, or club card programs consistent with this title.	Functional	intersects with	Product or Service Delivery Restrictions	1	Mechanisms exist to prevent discrimination against a data subject for exercising their legal rights pertaining to modifying or revoking consent, including prohibiting: (1) Refusing products and/or services; (2) Charging different rates for goods and/or services; and (3) Providing different levels of quality.	5	
1798.125(b)	N/A	N/A	Functional	no relationship	N/A	N/A	N/A Mechanisms exist to strictly govern financial incentives offered to data	N/A	No requirements to map to.
1798.125(b)(1)	N/A	A business may offer financial incentives, including payments to consumers as compensation, for the collection of personal information, the sale or sharing of personal information, or the retention of personal information. A business may also offer a different price, rate, level, or quality of goods or services to the consumer if that price or difference is reasonably related to the value provided to the business by the consumer's data.	Functional	intersects with	Financial Incentives For Personal Data (PD)	1	subjects for Personal Data (PD) to ensure compliance with applicable legal and regulatory requirements. Mechanisms exist to provide data subjects with a Notice of Financial	5	
1798.125(b)(2)	N/A	A business that offers any financial incentives pursuant to this subdivision, shall notify consumers of the financial incentives pursuant to Section 1798.130.	Functional	intersects with	Notice of Financial Incentive	PRI-17.2	Incentive that explains the material terms of a financial incentive, price or service difference so the data subject can make an informed decision about whether to participate.	5	
1798.125(b)(3)	N/A	A business may enter a consumer into a financial incentive program only if the consumer gives the business prior opt-in consent pursuant to Section 1798.130 that clearly describes the material terms of the financial incentive program, and which may be revoked by the consumer at any time. If a consumer refuses to provide opt-in consent, then the business shall wait for at least 12 months before next requesting that the consumer provide opt-in consent, or as prescribed by regulations adopted pursuant to Section 1798.185.	Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
1798.125(b)(3)	N/A	A business may enter a consumer into a financial incentive program only if the consumer gives the business prior opt-in consent pursuant to Section 1798.130 that clearly describes the material terms of the financial incentive program, and which may be revoked by the consumer at any time. If a consumer refuses to provide opt-in consent, then the business shall wait for at least 12 months before next requesting that the consumer provide opt-in consent, or as prescribed by regulations adopted pursuant to Section 1798.185.	Functional	intersects with	Financial Incentives For Personal Data (PD)	1	Mechanisms exist to strictly govern financial incentives offered to data subjects for Personal Data (PD) to ensure compliance with applicable legal and regulatory requirements.	5	
1798.125(b)(4)	N/A	A business shall not use financial incentive practices that are unjust, unreasonable, coercive, or usurious in nature.	Functional				N/A	N1/A	No was wise manufactor manufactor
		,	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.130	Notice, Disclosure, Correction, and Deletion Requirements		Functional	no relationship	N/A N/A	N/A N/A	N/A N/A	N/A	No requirements to map to. No requirements to map to.
1798.130 1798.130(a)	· ·								
	Correction, and Deletion Requirements	N/A In order to comply with Sections 1798.100, 1798.105, 1798.106, 1798.110, 1798.115, and 1798.125, a business shall,	Functional	no relationship	N/A	N/A N/A N/A PRI-02	N/A	N/A	No requirements to map to.
1798.130(a)(1) 1798.130(a)(1)(A) 1798.130(a)(1)(B)	Correction, and Deletion Requirements N/A N/A N/A N/A	In order to comply with Sections 1798.100, 1798.105, 1798.106, 1798.110, 1798.115, and 1798.125, a business shall, in a form that is reasonably accessible to consumers: N/A Make available to consumers two or more designated methods for submitting requests for information required to be disclosed pursuant to Sections 1798.100 and 1798.115, or requests for deletion or correction pursuant to Sections 1798.105 and 1798.106, respectively, including, at a minimum, a toll-free telephone number. A business that operates exclusively online and has a direct relationship with a consumer from whom it collects personness that operates exclusively online and has a direct relationship with a consumer from whom it collects personness that operates exclusively online and 1798.115, or for requests for information required to be disclosed pursuant to Sections 1798.110 and 1798.115, or for requests for deletion or correction pursuant to Sections 1798.105 and 1798.106, respectively. If the business maintains an internet website, make the internet website available to consumers to submit requests for information required to be disclosed pursuant to Sections 1798.110 and 1798.115, or requests for deletion or correction pursuant to Sections 1798.105 and 1798.105 and 1798.106, respectively.	Functional Functional Functional	no relationship no relationship intersects with	N/A N/A Data Privacy Notice Data Privacy Notice	N/A N/A N/A PRI-02	N/A N/A Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements. Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	N/A N/A N/A	No requirements to map to. No requirements to map to. No requirements to map to.
1798.130(a) 1798.130(a)(1) 1798.130(a)(1)(A)	Correction, and Deletion Requirements N/A N/A N/A	In order to comply with Sections 1798.100, 1798.105, 1798.106, 1798.110, 1798.115, and 1798.125, a business shall, in a form that is reasonably accessible to consumers: N/A Make available to consumers two or more designated methods for submitting requests for information required to be disclosed pursuant to Sections 1798.110 and 1798.115, or requests for deletion or correction pursuant to Sections 1798.105 and 1798.106, respectively, including, at a minimum, a toll-free telephone number. A business that operates exclusively online and has a direct relationship with a consumer from whom it collects personal information shall only be required to provide an email address for submitting requests for information required to be disclosed pursuant to Sections 1798.110 and 1798.115, or for requests for deletion or correction pursuant to Sections 1798.105 and 1798.106, respectively. If the business maintains an internet website, make the internet website available to consumers to submit requests for information required to be disclosed pursuant to Sections 1798.110 and 1798.115, or requests for deletion or	Functional Functional Functional	no relationship no relationship intersects with	N/A N/A Data Privacy Notice	N/A N/A PRI-02	N/A N/A N/A Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements. Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	N/A N/A	No requirements to map to. No requirements to map to.
1798.130(a)(1) 1798.130(a)(1)(A) 1798.130(a)(1)(B)	Correction, and Deletion Requirements N/A N/A N/A N/A	In order to comply with Sections 1798.100, 1798.105, 1798.106, 1798.110, 1798.115, and 1798.125, a business shall, in a form that is reasonably accessible to consumers: N/A Make available to consumers two or more designated methods for submitting requests for information required to be disclosed pursuant to Sections 1798.100 and 1798.115, or requests for deletion or correction pursuant to Sections 1798.105 and 1798.106 are spectively, including, at a minimum, a toll-free telephone number. A business that operates exclusively online and has a direct relationship with a consumer from whom it collects personal information shall only be required to provide an email address for submitting requests for information required to be disclosed pursuant to Sections 1798.110 and 1798.115, or for requests for deletion or correction pursuant to Sections 1798.105 and 1798.106, respectively. If the business maintains an internet website, make the internet website available to consumers to submit requests for information required to be disclosed pursuant to Sections 1798.110 and 1798.115, or requests for deletion or correction pursuant to Sections 1798.105 and 1798.105 and 1798.105 and 1798.106, respectively.	Functional Functional Functional Functional	no relationship no relationship intersects with	N/A N/A Data Privacy Notice Data Privacy Notice	N/A N/A PRI-02 PRI-02	N/A N/A Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements. Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	N/A N/A N/A	No requirements to map to. No requirements to map to. No requirements to map to.
1798.130(a)(1)(A) 1798.130(a)(1)(A) 1798.130(a)(1)(B)	N/A N/A N/A N/A	In order to compty with Sections 1798.105, 1798.105, 1798.106, 1798.110, 1798.115, and 1798.125, a business shall, in a form that is reasonably accessible to consumers: N/A	Functional Functional Functional Functional Functional	no relationship no relationship intersects with no relationship	N/A N/A N/A Data Privacy Notice N/A User Feedback Management User Feedback Management	N/A N/A PRI-02 PRI-06.4	N/A N/A Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements. Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	N/A N/A N/A	No requirements to map to. No requirements to map to. No requirements to map to.



Secure Controls Framework (SCF) 6 of 9

FDE#	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF#	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
1798.130(a)(3)(A)	N/A	A business that receives a verifiable consumer request pursuant to Section 1798.110 or 1798.115 shall disclose any personal information it has collected about a consumer, directly or indirectly, including through or by a service provider or contractor, to the consumer. A service provider or contractor shall not be required to comply with a verifiable consumer request received directly from a consumer or a consumer's authorized agent, pursuant to Section 1798.110 or 1798.115, to the extent that the service provider or contractor has collected personal information about the consumer in its role as a service provider or contractor. A service provider or contractor shall provide assistance to a business with which it has a contractual relationship with respect to the business' response to a verifiable consumer request, including, but not limited to, by providing to the business the consumer's personal information in the service provider or contractor's possession, which the service provider or contractor obtained as a result of providing services to the business, and by correcting inaccurate information or by enabling the business to do the same. A service provider or contractor that collects personal information pursuant to a written contract with a business shall be required to assist the business through appropriate technical and organizational measures	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to complaints, concerns or questions from authenticated data subjects about how the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes of their Personal Data (PD).	5	
1798.130(a)(3)(B)	N/A	in complying with the requirements of subdivisions (d) to (f), inclusive, of Section 1798.100, taking into account the nature of the processing. For purposes of subdivision (b) of Section 1798.110:	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.130(a)(3)(B)(i)	N/A	To identify the consumer, associate the information provided by the consumer in the verifiable consumer request to any personal information previously collected by the business about the consumer.	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to complaints, concerns or questions from authenticated data subjects about how the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes of their Personal Data (PD).	5	
1798.130(a)(3)(B)(ii)	N/A	Identify by category or categories the personal information collected about the consumer for the applicable period of time by reference to the enumerated category or categories in subdivision (c) that most closely describes the personal information collected; the categories of sources from which the consumer's personal information was collected; the business or commercial purpose for collecting, selling, or sharing the consumer's personal information; and the categories of third parties to whom the business discloses the consumer's personal information.	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to complaints, concerns or questions from authenticated data subjects about how the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes of their Personal Data (PD).	5	
1798.130(a)(3)(B)(iii)	N/A	Provide the specific pieces of personal information obtained from the consumer in a format that is easily understandable to the average consumer, and to the extent technically feasible, in a structured, commonly used, machine-readable format that may also be transmitted to another entity at the consumer's request without hindrance. "Specific pieces of information" do not include data generated to help ensure security and integrity or as prescribed by regulation. Personal information is not considered to have been disclosed by a business when a consumer instructs a business to transfer the consumer's personal information from one business to another in the context of switching services.	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to complaints, concerns or questions from authenticated data subjects about how the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes of their Personal Data (PD).	5	
1798.130(a)(4)	N/A	For purposes of subdivision (b) of Section 1798.115:	Functional	no relationship	N/A	N/A	N/A Mechanisms exist to maintain a process to efficiently and effectively	N/A	No requirements to map to.
1798.130(a)(4)(A)	N/A	Identify the consumer and associate the information provided by the consumer in the verifiable consumer request to any personal information previously collected by the business about the consumer.	Functional	intersects with	User Feedback Management	PRI-06.4	respond to complaints, concerns or questions from authenticated data subjects about how the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes of their Personal Data (PD). Mechanisms exist to maintain a process to efficiently and effectively	5	
1798.130(a)(4)(B)	N/A	Identify by category or categories the personal information of the consumer that the business sold or shared during the applicable period of time by reference to the enumerated category in subdivision (c) that most closely describes the personal information, and provide the categories of third parties to whom the consumer's personal information was sold or shared during the applicable period of time by reference to the enumerated category or categories in subdivision (c) that most closely describes the personal information sold or shared. The business shall disclose the information in a list that is separate from a list generated for the purposes of subparagraph (C).	Functional	intersects with	User Feedback Management	PRI-06.4	respond to complaints, concerns or questions from authenticated data subjects about how the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes of their Personal Data (PD).	5	
1798.130(a)(4)(C)	N/A	Identify by category or categories the personal information of the consumer that the business disclosed for a business purpose during the applicable period of time by reference to the enumerated category or categories in subdivision (c) that most closely describes the personal information, and provide the categories of persons to whom the consumer's personal information was disclosed for a business purpose during the applicable period of time by reference to the enumerated category or categories in subdivision (c) that most closely describes the personal information disclosed. The business shall disclose the information in a list that is separate from a list generated for the purposes of subparagraph (B).	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to complaints, concerns or questions from authenticated data subjects about how the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes of their Personal Data (PD).	5	
1798.130(a)(5)	N/A	Disclose the following information in its online privacy policy or policies if the business has an online privacy policy or policies and in any California-specific description of consumers' privacy rights, or if the business does not maintain those policies, on its internet website, and update that information at least once every 12 months:	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to complaints, concerns or questions from authenticated data subjects about how the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes of their Personal Data (PD).	5	
1798.130(a)(5)(A)	N/A	A description of a consumer's rights pursuant to Sections 1798.100, 1798.105, 1798.106, 1798.110, 1798.115, and 1798.125 and two or more designated methods for submitting requests, except as provided in subparagraph (A) of paragraph (1) of subdivision (a).	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to complaints, concerns or questions from authenticated data subjects about how the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes of their Personal	5	
1798.130(a)(5)(B)	N/A	For purposes of subdivision (c) of Section 1798.110: A list of the categories of personal information it has collected about consumers in the preceding 12 months by		no relationship	Personal Data	N/A	Data (PD). N/A Mechanisms exist to define and implement data handling and	N/A	No requirements to map to.
1798.130(a)(5)(B)(i) 1798.130(a)(5)(B)(i)	N/A N/A	reference to the enumerated category or categories in subdivision (c) that most closely describe the personal information collected. A list of the categories of personal information it has collected about consumers in the preceding 12 months by reference to the enumerated category or categories in subdivision (c) that most closely describe the personal	Functional	intersects with	Categories Documenting Data		Data (PD). Mechanisms exist to document Personal Data (PD) processing activities that cover collecting, receiving, processing, storing,	5	
1798.130(a)(5)(B)(ii)	N/A	information collected. The categories of sources from which consumers' personal information is collected.	Functional	intersects with	Processing Activities Documenting Data		transmitting, updating, sharing and disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements. Mechanisms exist to document Personal Data (PD) processing activities that cover collecting, receiving, processing, storing, transmitting, updating, sharing and disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory	5	
1798.130(a)(5)(B)(iii)	N/A	The business or commercial purpose for collecting, selling, or sharing consumers' personal information.	Functional	intersects with	Documenting Data Processing Activities	PRI-14	and contractual requirements. Mechanisms exist to document Personal Data (PD) processing activities that cover collecting, receiving, processing, storing, transmitting, updating, sharing and disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements. Mechanisms exist to document Personal Data (PD) processing	5	
1798.130(a)(5)(B)(iv)	N/A	The categories of third parties to whom the business discloses consumers' personal information.	Functional	intersects with	Documenting Data Processing Activities	PRI-14	activities that cover collecting, receiving, processing, storing, transmitting, updating, sharing and disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	
1798.130(a)(5)(B)(iv)	N/A	The categories of third parties to whom the business discloses consumers' personal information.	Functional	intersects with	Documenting Data Processing Activities		Mechanisms exist to document Personal Data (PD) processing activities that cover collecting, receiving, processing, storing, transmitting, updating, sharing and disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	5	
1798.130(a)(5)(C) 1798.130(a)(5)(C)(i)	N/A N/A	For purposes of paragraphs (1) and (2) of subdivision (c) of Section 1798.115, two separate lists: A list of the categories of personal information it has sold or shared about consumers in the preceding 12 months by reference to the enumerated category or categories in subdivision (c) that most closely describe the personal information sold or shared, or if the business has not sold or shared consumers' personal information in the preceding 12 months, the business shall prominently disclose that fact in its privacy policy.	Functional Functional	no relationship	Documenting Data	N/A PRI-14	N/A Mechanisms exist to document Personal Data (PD) processing activities that cover collecting, receiving, processing, storing, transmitting, updating, sharing and disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory and contractual requirements.	N/A 5	No requirements to map to.
1798.130(a)(5)(C)(i)	N/A	A list of the categories of personal information it has sold or shared about consumers in the preceding 12 months by reference to the enumerated category or categories in subdivision (c) that most closely describe the personal information sold or shared, or if the business has not sold or shared consumers' personal information in the preceding 12 months, the business shall prominently disclose that fact in its privacy policy.	Functional	intersects with	Accounting of Disclosures	PRI-14.1	Mechanisms exist to provide data subjects with an accounting of disclosures of their Personal Data (PD) controlled by: (1) The organization; and/or (2) Relevant third-parties that their PD was shared with.	5	
1798.130(a)(5)(C)(ii)	N/A	A list of the categories of personal information it has disclosed about consumers for a business purpose in the preceding 12 months by reference to the enumerated category in subdivision (c) that most closely describes the personal information disclosed, or if the business has not disclosed consumers' personal information for a business purpose in the preceding 12 months, the business shall disclose that fact.	Functional	intersects with	Documenting Data Processing Activities	PRI-14	Mechanisms exist to document Personal Data (PD) processing activities that cover collecting, receiving, processing, storing, transmitting, updating, sharing and disposal actions with sufficient detail to demonstrate conformity with applicable statutory, regulatory	5	
1798.130(a)(5)(C)(ii)	N/A	A list of the categories of personal information it has disclosed about consumers for a business purpose in the preceding 12 months by reference to the enumerated category in subdivision (c) that most closely describes the personal information disclosed, or if the business has not disclosed consumers' personal information for a business purpose in the preceding 12 months, the business shall disclose that fact.	Functional	intersects with	Accounting of Disclosures	PRI-14.1	and contractual requirements. Mechanisms exist to provide data subjects with an accounting of disclosures of their Personal Data (PD) controlled by: (1) The organization; and/or (2) Relevant third-parties that their PD was shared with. Mechanisms exist to proactively govern the following personnel	5	
1798.130(a)(6)	N/A	Ensure that all individuals responsible for handling consumer inquiries about the business' privacy practices or the business' compliance with this title are informed of all requirements in Sections 1798.100, 1798.105, 1798.106, 1798.110, 1798.125, and this section, and how to direct consumers to exercise their rights under those sections.	Functional	intersects with	Onboarding, Transferring & Offboarding Personnel	HRS-01.1	management actions: (1) Onboarding new personnel (e.g., new hires); (2) Transferring personnel into new roles within the organization; and (3) Offboarding personnel (e.g., termination of employment).	5	
1798.130(a)(6)	N/A	Ensure that all individuals responsible for handling consumer inquiries about the business' privacy practices or the business' compliance with this title are informed of all requirements in Sections 1798.100, 1798.105, 1798.106, 1798.110, 1798.115, 1798.125, and this section, and how to direct consumers to exercise their rights under those sections.	Functional	intersects with	Role-Based Cybersecurity & Data Privacy Training	SAT-03	Mechanisms exist to provide role-based cybersecurity & data privacy-related training: (1) Before authorizing access to the system or performing assigned duties; (2) When required by system changes; and (3) Annually thereafter.	5	
1798.130(a)(6)	N/A	Ensure that all individuals responsible for handling consumer inquiries about the business' privacy practices or the business' compliance with this title are informed of all requirements in Sections 1798.100, 1798.105, 1798.106, 1798.110, 1798.115, 1798.125, and this section, and how to direct consumers to exercise their rights under those sections.	Functional	intersects with	Sensitive / Regulated Data Storage, Handling & Processing	SAT-03.3	Mechanisms exist to ensure that every user accessing a system processing, storing or transmitting sensitive / regulated data is formally trained in data handling requirements.	5	
1798.130(a)(7)	N/A	Use any personal information collected from the consumer in connection with the business' verification of the consumer's request solely for the purposes of verification and shall not further disclose the personal information, retain it longer than necessary for purposes of verification, or use it for unrelated purposes.	Functional	intersects with	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, updating and/or sharing Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1798.130(b)	N/A	A business is not obligated to provide the information required by Sections 1798.110 and 1798.115 to the same consumer more than twice in a 12-month period. The categories of personal information required to be disclosed pursuant to Sections 1798.100, 1798.110, and	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.130(c)	N/A	1798.115 shall follow the definitions of personal information and sensitive personal information in Section 1798.140 by describing the categories of personal information using the specific terms set forth in subparagraphs (A) to (K), inclusive, of paragraph (1) of subdivision (v) of Section 1798.140 and by describing the categories of sensitive personal information using the specific terms set forth in paragraphs (1) to (9), inclusive, of subdivision (ae) of Section 1798.140.		no relationship	N/A	N/A	N/A	N/A	No requirements to map to.



Secure Controls Framework (SCF) 7 of 9

FDE#	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF#	Secure Controls Framework (SCF) Control Description	Strength of Relationship (optional)	Notes (optional)
1798.135	Methods of Limiting Sale Sharing, and Use of Personal Information and Use of Sensitive	N/A	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.135(a)	Personal Information N/A	A business that sells or shares consumers' personal information or uses or discloses consumers' sensitive personal information for purposes other than those authorized by subdivision (a) of Section 1798.121 shall, in a form that is	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.135(a)(1)	N/A	reasonably accessible to consumers: Provide a clear and conspicuous link on the business' internet homepages, titled "Do Not Sell or Share My Personal Information," to an internet web page that enables a consumer, or a person authorized by the consumer, to opt out	Functional	intersects with	Active Participation By Data Subjects	PRI-03.7	Mechanisms exist to compel data subjects to select the level of consent deemed appropriate by the data subject for the relevant	5	
1798.135(a)(1)	N/A	of the sale or sharing of the consumer's personal information. Provide a clear and conspicuous link on the business' internet homepages, titled "Do Not Sell or Share My Personal Information," to an internet web page that enables a consumer, or a person authorized by the consumer, to opt out	Functional	intersects with	Conspicuous Link To	PRI-17.1	business purpose (e.g., opt-in, opt-out, accept all cookies, etc.). Mechanisms exist to include a conspicuous link to the organization's data privacy notice on all consumer-facing websites and mobile	5	
17001105(d)(1)		of the sale or sharing of the consumer's personal information. Provide a clear and conspicuous link on the business' internet homepages, titled "Limit the Use of My Sensitive	T directional		Data Privacy Notice		applications. Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed;		
1798.135(a)(2)	N/A	Personal Information," that enables a consumer, or a person authorized by the consumer, to limit the use or disclosure of the consumer's sensitive personal information to those uses authorized by subdivision (a) of Section 1798.121.	Functional	intersects with	Data Privacy Notice	PRI-02	 (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements. 	5	
1798.135(a)(2)	N/A	Provide a clear and conspicuous link on the business' internet homepages, titled "Limit the Use of My Sensitive Personal Information," that enables a consumer, or a person authorized by the consumer, to limit the use or disclosure of the consumer's sensitive personal information to those uses authorized by subdivision (a) of Section 1798.121.	Functional	intersects with	Choice & Consent	PRI-03	Mechanisms exist to enable data subjects to authorize the collection, processing, storage, sharing, updating and disposal of their Personal Data (PD), where prior to collection the data subject is provided with: (1) Plain language to illustrate the potential data privacy risks of the authorization; (2) A means for users to decline the authorization; and (3) All necessary choice and consent-related criteria required by applicable statutory, regulatory and contractual obligations.	5	
1798.135(a)(2)	N/A	Provide a clear and conspicuous link on the business' internet homepages, titled "Limit the Use of My Sensitive Personal Information," that enables a consumer, or a person authorized by the consumer, to limit the use or disclosure of the consumer's sensitive personal information to those uses authorized by subdivision (a) of Section 1798.121.	Functional	intersects with	Conspicuous Link To Data Privacy Notice	PRI-17.1	Mechanisms exist to include a conspicuous link to the organization's data privacy notice on all consumer-facing websites and mobile applications.	5	
1798.135(a)(3)	N/A	At the business' discretion, utilize a single, clearly labeled link on the business' internet homepages, in lieu of complying with paragraphs (1) and (2), if that link easily allows a consumer to opt out of the sale or sharing of the consumer's personal information and to limit the use or disclosure of the consumer's sensitive personal information.	Functional	intersects with	Active Participation By Data Subjects	PRI-03.7	Mechanisms exist to compel data subjects to select the level of consent deemed appropriate by the data subject for the relevant business purpose (e.g., opt-in, opt-out, accept all cookies, etc.).	5	
1798.135(a)(4) 1798.135(b)	N/A N/A	In the event that a business responds to opt-out requests received pursuant to paragraph (1), (2), or (3) by informing the consumer of a charge for the use of any product or service, present the terms of any financial incentive offered pursuant to subdivision (b) of Section 1798.125 for the retention, use, sale, or sharing of the consumer's personal information. N/A	Functional Functional	intersects with no relationship	Incentive	PRI-17.2	Mechanisms exist to provide data subjects with a Notice of Financial Incentive that explains the material terms of a financial incentive, price or service difference so the data subject can make an informed decision about whether to participate. N/A	5 N/A	No requirements to map to.
1798.135(b)(1)	N/A	A business shall not be required to comply with subdivision (a) if the business allows consumers to opt out of the sale or sharing of their personal information and to limit the use of their sensitive personal information through an opt-out preference signal sent with the consumer's consent by a platform, technology, or mechanism, based on technical specifications set forth in regulations adopted pursuant to paragraph (19) of subdivision (a) of Section 1798.185, to the business indicating the consumer's intent to opt out of the business' sale or sharing of the consumer's personal information or to limit the use or disclosure of the consumer's sensitive personal information, or both.	Functional	no relationship		N/A	N/A	N/A	No requirements to map to.
1798.135(b)(2)	N/A	A business that allows consumers to opt out of the sale or sharing of their personal information and to limit the use of their sensitive personal information pursuant to paragraph (1) may provide a link to a web page that enables the consumer to consent to the business ignoring the opt-out preference signal with respect to that business' sale or sharing of the consumer's personal information or the use of the consumer's sensitive personal information for additional purposes provided that:	Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
1798.135(b)(2)(A)	N/A	The consent web page also allows the consumer or a person authorized by the consumer to revoke the consent as easily as it is affirmatively provided.	Functional	intersects with	Choice & Consent	PRI-03	Mechanisms exist to enable data subjects to authorize the collection, processing, storage, sharing, updating and disposal of their Personal Data (PD), where prior to collection the data subject is provided with: (1) Plain language to illustrate the potential data privacy risks of the authorization; (2) A means for users to decline the authorization; and (3) All necessary choice and consent-related criteria required by applicable statutory, regulatory and contractual obligations.	5	
1798.135(b)(2)(A)	N/A	The consent web page also allows the consumer or a person authorized by the consumer to revoke the consent as easily as it is affirmatively provided.	Functional	intersects with	Revoke Consent	PRI-03.4	Mechanisms exist to allow data subjects to revoke consent to collect, receive, process, store, transmit, update and/or share their Personal Data (PD).	5	
1798.135(b)(2)(B)	N/A	The link to the web page does not degrade the consumer's experience on the web page the consumer intends to visit and has a similar look, feel, and size relative to other links on the same web page.	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.135(b)(2)(C)	N/A	The consent web page complies with technical specifications set forth in regulations adopted pursuant to paragraph (19) of subdivision (a) of Section 1798.185. A business that complies with subdivision (a) is not required to comply with subdivision (b). For the purposes of	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.135(b)(3) 1798.135(c)	N/A N/A	clarity, a business may elect whether to comply with subdivision (a) or subdivision (b). A business that is subject to this section shall:	Functional Functional	no relationship	N/A N/A	N/A N/A	N/A N/A N/A	N/A N/A	No requirements to map to. No requirements to map to.
1798.135(c)(1)	N/A	Not require a consumer to create an account or provide additional information beyond what is necessary in order to direct the business not to sell or share the consumer's personal information or to limit use or disclosure of the consumer's sensitive personal information.	Functional	intersects with	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to minimize the collection of Personal Data (PD) to only what is adequate, relevant and limited to the purposes identified in the data privacy notice, including protections against collecting PD from minors without appropriate parental or legal guardian consent. Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first	5	
1798.135(c)(2)	N/A	Include a description of a consumer's rights pursuant to Sections 1798.120 and 1798.121, along with a separate link to the "Do Not Sell or Share My Personal Information" internet web page and a separate link to the "Limit the Use of My Sensitive Personal Information" internet web page, if applicable, or a single link to both choices, or a statement that the business responds to and abides by opt-out preference signals sent by a platform, technology, or mechanism in accordance with subdivision (b), in:	Functional	intersects with	Data Privacy Notice	PRI-02	 (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements. 	5	
1798.135(c)(2)(A)	N/A	Its online privacy policy or policies if the business has an online privacy policy or policies.	Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	



Secure Controls Framework (SCF) 8 of 9

FDE#	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF#	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes (optional)
1798.135(c)(2)(B)	N/A	Any California-specific description of consumers' privacy rights.	Functional	intersects with	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations. (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	(optional)	
1798.135(c)(3)	N/A	Ensure that all individuals responsible for handling consumer inquiries about the business privacy practices or the business compliance with this title are informed of all requirements in Sections 1798.120, 1798.121, and this section and how to direct consumers to exercise their rights under those sections.	Functional	intersects with	Defined Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity roles & responsibilities for all personnel.	5	
1798.135(c)(3)	N/A	Ensure that all individuals responsible for handling consumer inquiries about the business privacy practices or the business compliance with this title are informed of all requirements in Sections 1798.120, 1798.121, and this section	Functional	intersects with	User Awareness	HRS-03.1	Mechanisms exist to communicate with users about their roles and responsibilities to maintain a safe and secure working environment.	5	
1798.135(c)(3)	N/A	and how to direct consumers to exercise their rights under those sections. Ensure that all individuals responsible for handling consumer inquiries about the business privacy practices or the business compliance with this title are informed of all requirements in Sections 1798.120, 1798.121, and this section and how to direct consumers to exercise their rights under those sections.	Functional	intersects with	Role-Based Cybersecurity & Data Privacy Training	SAT-03	Mechanisms exist to provide role-based cybersecurity & data privacy-related training: (1) Before authorizing access to the system or performing assigned duties; (2) When required by system changes; and (3) Annually thereafter.	5	
1798.135(c)(3)	N/A	Ensure that all individuals responsible for handling consumer inquiries about the business privacy practices or the business compliance with this title are informed of all requirements in Sections 1798.120, 1798.121, and this section and how to direct consumers to exercise their rights under those sections.	Functional	intersects with	Sensitive / Regulated Data Storage, Handling & Processing	SAT-03.3	Mechanisms exist to ensure that every user accessing a system processing, storing or transmitting sensitive / regulated data is formally trained in data handling requirements.	5	
1798.135(c)(4)	N/A	For consumers who exercise their right to opt out of the sale or sharing of their personal information or limit the use or disclosure of their sensitive personal information, refrain from selling or sharing the consumer's personal information or using or disclosing the consumer's sensitive personal information and wait for at least 12 months before requesting that the consumer authorize the sale or sharing of the consumer's personal information or the use and disclosure of the consumer's sensitive personal information for additional purposes, or as authorized by regulations.	Functional	intersects with	Prohibition of Selling,	PRI-03.3	Mechanisms exist to prevent the sale, processing and/or sharing of Personal Data (PD) when: (1) Instructed by the data subject; or (2) The data subject is a minor, where selling and/or sharing PD is legally prohibited.	5	
1798.135(c)(5)	N/A	For consumers under 16 years of age who do not consent to the sale or sharing of their personal information, refrain from selling or sharing the personal information of the consumer under 16 years of age and wait for at least 12 months before requesting the consumer's consent again, or as authorized by regulations or until the consumer attains 16 years of age.	Functional	intersects with	Prohibition of Selling, Processing and/or Sharing Personal Data (PD)	PRI-03.3	Mechanisms exist to prevent the sale, processing and/or sharing of Personal Data (PD) when: (1) Instructed by the data subject; or (2) The data subject is a minor, where selling and/or sharing PD is legally prohibited.	5	
1798.135(c)(6)	N/A	Use any personal information collected from the consumer in connection with the submission of the consumer's opt-out request solely for the purposes of complying with the opt-out request.	Functional	intersects with	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, updating and/or sharing Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1798.135(d)	N/A	Nothing in this title shall be construed to require a business to comply with the title by including the required links and text on the homepage that the business makes available to the public generally, if the business maintains a separate and additional homepage that is dedicated to California consumers and that includes the required links and text, and the business takes reasonable steps to ensure that California consumers are directed to the homepage for California consumers and not the homepage made available to the public generally.	Functional	intersects with	Conspicuous Link To Data Privacy Notice	PRI-17.1	Mechanisms exist to include a conspicuous link to the organization's data privacy notice on all consumer-facing websites and mobile applications.	5	
1798.135(e)	N/A	A consumer may authorize another person to opt out of the sale or sharing of the consumer's personal information and to limit the use of the consumer's sensitive personal information on the consumer's behalf, including through an opt-out preference signal, as defined in paragraph (1) of subdivision (b), indicating the consumer's intent to opt out, and a business shall comply with an opt-out request received from a person authorized by the consumer to act on the consumer's behalf, pursuant to regulations adopted by the Attorney General regardless of whether the business has elected to comply with subdivision (a) or (b). For purposes of clarity, a business that elects to comply with subdivision (a) may respond to the consumer's opt-out request consistently with Section 1798.125.	Functional	intersects with	Authorized Agent	PRI-03.6	Mechanisms exist to allow data subjects to authorize another person or entity, acting on the data subject's behalf, to make Personal Data (PD) processing decisions.	5	
1798.135(e)	N/A	A consumer may authorize another person to opt out of the sale or sharing of the consumer's personal information and to limit the use of the consumer's sensitive personal information on the consumer's behalf, including through an opt-out preference signal, as defined in paragraph (1) of subdivision (b), indicating the consumer's intent to opt out, and a business shall comply with an opt-out request received from a person authorized by the consumer to act on the consumer's behalf, pursuant to regulations adopted by the Attorney General regardless of whether the business has elected to comply with subdivision (a) or (b). For purposes of clarity, a business that elects to comply with subdivision (a) may respond to the consumer's opt-out request consistently with Section 1798.125.	Functional	intersects with	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to: (1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access; (2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and disposed; (3) Obtain the source(s) of their PD; (4) Obtain the categories of their PD being collected, received, processed, stored and shared; (5) Request correction to their PD due to inaccuracies; (6) Request erasure of their PD; and (7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
1798.135(e)	N/A	A consumer may authorize another person to opt out of the sale or sharing of the consumer's personal information and to limit the use of the consumer's sensitive personal information on the consumer's behalf, including through an opt-out preference signal, as defined in paragraph (1) of subdivision (b), indicating the consumer's intent to opt out, and a business shall comply with an opt-out request received from a person authorized by the consumer to act on the consumer's behalf, pursuant to regulations adopted by the Attorney General regardless of whether the business has elected to comply with subdivision (a) or (b). For purposes of clarity, a business that elects to comply with subdivision (a) may respond to the consumer's opt-out request consistently with Section 1798.125.	Functional	intersects with	User Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to complaints, concerns or questions from authenticated data subjects about how the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes of their Personal Data (PD).	5	
1798.135(f)	N/A	If a business communicates a consumer's opt-out request to any person authorized by the business to collect personal information, the person shall thereafter only use that consumer's personal information for a business purpose specified by the business, or as otherwise permitted by this title, and shall be prohibited from:	Functional	no relationship	N/A	N/A	N/A	N/A	No requirements to map to.
1798.135(f)(1)	N/A	Selling or sharing the personal information.	Functional	intersects with	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, updating and/or sharing Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1798.135(f)(2)	N/A	Retaining, using, or disclosing that consumer's personal information.	Functional	intersects with	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, updating and/or sharing Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1798.135(f)(2)(A)	N/A	For any purpose other than for the specific purpose of performing the services offered to the business.	Functional	intersects with	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, updating and/or sharing Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1798.135(f)(2)(B)	N/A	Outside of the direct business relationship between the person and the business.	Functional	intersects with	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, updating and/or sharing Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1798.135(f)(2)(C)	N/A	For a commercial purpose other than providing the services to the business.	Functional	intersects with	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, updating and/or sharing Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
1798.135(g)	N/A	A business that communicates a consumer's opt-out request to a person pursuant to subdivision (f) shall not be liable under this title if the person receiving the opt-out request violates the restrictions set forth in the title provided that, at the time of communicating the opt-out request, the business does not have actual knowledge, or reason to believe, that the person intends to commit such a violation. Any provision of a contract or agreement of any kind that purports to waive or limit in any way this subdivision shall be void and unenforceable.		no relationship		N/A	N/A		No requirements to map to.
1798.140 1798.145	Definitions Exemptions	See the law for details See the law for details		no relationship		N/A N/A	N/A N/A	N/A N/A	No requirements to map to. No requirements to map to.



Secure Controls Framework (SCF)