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CCPA-Covered Personal Information

This list provides an overview of the categories and specific data elements covered by CA's Consumer Privacy Act. It is not an exhaustive list. Every business will have to review the data it processes to understand what data is in scope for compliance purposes.

Identifiers & Characteristics[i]

- real name
- signature
- user alias / account name
- unique pseudonym
- customer number
- postal address
- email address
- social security number
- driver's license number or state identification card number
- passport number
- telephone number
- insurance policy number
- military or veteran status
- national origin
- race
- age (over 40)
- color
- religious creed
- sex/gender
- gender identity
- gender expression
- sexual orientation
- marital status

Education Information[ii]

- education
- student's report card & transcript
- student's disciplinary record
- student's dates of attendance
- student's honors and awards
- student's participation in officially recognized activities/sports

Electronic Data[iii]

- Internet Protocol (IP) address
- device identifier
- cookies
- beacons
- pixel tags
- mobile ad identifiers
- physical characteristics or description
- browsing history
- search history
- consumer's click stream
- geolocation data (latitude and longitude coordinates; postal/zip code)
- contents, sender, recipients, format, or location of the sender or recipients at any point during electronic communication
- time or date electronic communication was created, sent, or received
- any information pertaining to any individual or device participating in electronic communication
- information stored on or generated through operation of electronic device (including current and prior locations of electronic device)

Commercial Information[iv]

- products or services purchased, obtained, or considered
- other purchasing or consuming histories or tendencies
- records of personal property

Employment Information[v]
- employment status
- employment history
- request for family care leave
- request for leave for an employee's own serious health condition
- request for pregnancy disability leave
- employee's job application file
- employee's personal file
- employee's payroll/benefits information
- employee's leave/medical file
- resume
- employment contract
- independent contractor agreement
- performance review
- disciplinary record

Biometric & Physical Information[vi]
- imagery of the iris & retina
- imagery of the face
- any other physiological characteristics
- fingerprint, hand, palm, vein patterns
- voice recordings
- keystroke patterns or rhythms
- audio recordings
- visual information
- thermal information
- olfactory information

Financial Information[vii]
- bank account number
- credit card number
- debit card number
- any other financial information

Health Information[viii]
- any medical information
- medical condition (genetic characteristics, cancer or a record or history of cancer)
- health insurance information
- sex/gender (includes pregnancy, childbirth, breastfeeding and/ or related medical conditions)
- ancestry
- disability (mental and physical including HIV/AIDS, cancer, and genetic characteristics)
- genetic information / individual's deoxyribonucleic acid (DNA)
- gait patterns or rhythms
- sleep, health, or exercise data
- retaliation for reporting patient abuse in tax-supported institutions

Inferred Data[ix]
- Inferences drawn from any individual data element or combination of Personal Information
- Any derivation of Personal Information
- Any profile or segment attributed to an individual
- Consumer identification more likely than not
- Any predicted characteristics or trait

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i **Cal. Civ. Code § 1798.140(o)(1)(A)** (covering real name; user alias/account name; postal address; email address; social security number; passport number); **Cal. Civ. Code § 1798.140(x)** (covering unique pseudonym; customer number; telephone number); **Cal. Civ. Code § 1798.80(e)** (covering signature; driver's license or state identification card number; insurance policy number); **Cal. Gov. Code § 12940** (covering military or veteran status; national origin; race; age [over 40]; color; religious creed; sex/gender; gender identity; gender expression; sexual orientation; marital status); **Cal. Civ. Code § 1798.140(o)(1)(D)** (covering records of personal property)

ii **20 U.S.C. § 1232g; 34 C.F.R. Part 99** (covering education; student's report card & transcript; student's disciplinary record; student's dates of attendance; student's honors and awards; student's participation in officially recognized activities/sports)

iii **Cal. Civ. Code § 1798.140(x)** (covering Internet Protocol (IP) address; device identifier; cookies; beacons; pixel tags; mobile ad identifiers); **Cal. Civ. Code § 1798.80(e)** (covering physical characteristics or description); **Cal. Civ. Code § 1798.140(o)(1)(F)** (covering browsing history; search history); **Cal. Civ. Code § 1798.140(o)(1)(G)** (covering geolocation data [latitude and longitude coordinates; postal/zip code]); **Cal. Electronic Comm. Privacy Act Ch. 3.6** (covering the contents, sender, recipients, format, or location of the sender or recipients at any point during electronic communication; time or date electronic communication was created, sent, or received; any information pertaining to any individual or device participating in electronic communication; information stored on or generated through operation of an electronic device [including current and prior locations of electronic device]); **Cal. Civ. Code § 1798.140(o)(1)(F)** (covering consumer's click stream as an example of information regarding a consumer's interaction with an Internet Web site, application, or advertisement)

iv **Cal. Civ. Code § 1798.140(o)(1)(D)** (covering products or services purchased, obtained, or considered; other purchasing or consuming histories or tendencies)

v https://www.dickinson-wright.com/news-alerts/the-gdpr-covers-employee-hr-data-and-tricky (covering employment status; employment history; employee's job application file; employee's personal file; employee's payroll/benefits information; employee's leave/medical file); **Cal. Gov. Code § 12945.2** (covering request for family care leave; request for leave for an employee's own serious health condition; request for pregnancy disability leave); https://www.jacksonlewis.com/publication/california-consumer-privacy-act-faqs-employers (covering resume; employment contract; independent contractor agreement; performance review; disciplinary record)

vi **Cal. Civ. Code § 1798.140(b)** (covering imagery of the iris & retina; imagery of the face; any other physiological characteristics; fingerprint, hand, palm, vein patterns; voice recordings; keystroke patterns or rhythms); https://iapp.org/news/a/how-do-the-rules-on-audio-recording-change-under-the-gdpr/ (covering audio recordings under the GDPR); **Cal. Civ. Code § 1798.140(o)(1)(H)** (covering visual information; thermal information; olfactory information)

vii **Cal. Civ. Code § 1798.80(e)** (covering bank account number; credit card number; debit card number; any other financial information)

viii **Cal. Civ. Code § 1798.80(e)** (covering any medical information; health insurance information); **https://www.senate.ca.gov/content/protected-classes** (covering medical condition [genetic characteristics, cancer or a record or history of cancer]; sex/gender [includes pregnancy, childbirth, breastfeeding and/or related medical conditions]; ancestry; disability [mental and physical including HIV/AIDS, cancer, and genetic characteristics]; retaliation for reporting patient abuse in tax-supported institutions); **Cal. Civ. Code § 1798.140(b)** (covering genetic information/individual's deoxyribonucleic acid [DNA]; gait patterns or rhythms; sleep, health or exercise data)

ix **Cal. Civ. Code § 1798.140(o)(K)** (covering inferences drawn from any individual data element or combination of Personal Information; any derivation of Personal Information; any profile or segment attributed to an individual; any predicted characteristics or traits); **Cal. Civ. Code § 1798.140(p)** (covering consumer identification more likely than not)