



CR Data Rights Study <datarightsstudy@cr.org>

## RE: Incoming Do Not Sell requests from Consumer Reports - Acxiom – CCPA California Consumer Inquiry Procedures

consumeradvo - Consumer Advocate <consumeradvo@acxiom.com>

Wed, Nov 4, 2020 at 6:12 PM

To: CR Data Rights Study <datarightsstudy@cr.org>

Cc: [Redacted]

Consumer Advocate <consumeradvo@acxiom.com>

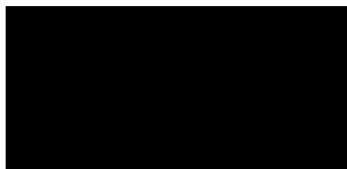
Good evening Ginny,

I understand from your email that your team made the decision to submit requests and mail them to Acxiom for their CCPA requests. If this is the case, then please understand that the submission of personal information through the mail is not one of the options available at Acxiom to determine identity verification.

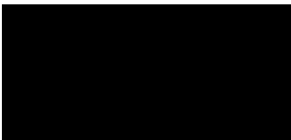
To verify your identity we use Acxiom’s identity verification process and the easiest way for a person to do this is by utilizing the Acxiom online CCPA portal. There is an alternate option that is utilized occasionally for identity verification and we coordinate a day and time with the requestor so that I can make an appointment to administer the verification exam.

It would save each of you a great deal of time and energy to utilize Acxiom’s automated system for your “Right to Know” access report or your “Right to Delete”. Again information regarding CCPA options and ability to make requests is located: [here](#)

Have a nice evening.



TEL [Redacted]  
TEL [Redacted]



[acxiom.com](http://acxiom.com)



11/17/2020

Consumer Reports Mail - RE: Incoming Do Not Sell requests from Consumer Reports - Acxiom – CCPA California Consumer Inquiry Procedures

**From:** ginny [REDACTED] **On Behalf Of** CR Data Rights Study  
**Sent:** Friday, October 30, 2020 3:04 PM  
**To:** consumeradvo - Consumer Advocate <consumeradvo@acxiom.com>  
**Cc:** [REDACTED]  
**Subject:** Re: Incoming Do Not Sell requests from Consumer Reports - Acxiom – CCPA California Consumer Inquiry Procedures

[REDACTED]

Thanks for your response and for letting us know that the portal design does not support authorized agent opt-outs at this time. We decided to submit the requests in paper and have mailed them to P.O. Box 2000 Conway AR 72033-9928.

If we end up testing access and delete workflows in the future then I may reach back out about the CCPA portal interface walkthrough, thank you for offering that.

Have a good weekend!

Best,

Ginny

On Tue, Oct 27, 2020 at 6:46 PM consumeradvo - Consumer Advocate <consumeradvo@acxiom.com> wrote:

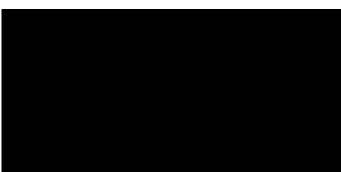
Hello Ginny, wanted to touch base to let you know that I did receive your most recent email from Monday, October 26th.

After reviewing your message I went ahead and escalated the Consumer Reports proposed testing methodology as you have defined it for testing the CCPA portal at Acxiom. In walking through your logic, the solutions/technical team has determined that our portal design was not set up for the external testing that you are proposing. That testing would require additional work with respect to verification and access, etc.

What is being proposed and might work for you is to set up a meeting with you or whomever might be performing these tests, and do a walkthrough of the CCPA Portal interface. From that exercise we can see to what extent this will suffice for your Agency Use Case.

Possibly you could provide some times what you would be available tomorrow and have the opportunity to meet? With that information I will coordinate a call to discuss.



Have a nice evening.




acxiom.



  
[acxiom.com](https://www.acxiom.com)

**From:** Ginny   
**Sent:** Monday, October 26, 2020 3:45 PM  
**To:** consumeradvo - Consumer Advocate <[consumeradvo@acxiom.com](mailto:consumeradvo@acxiom.com)>  
**Cc:** CR Data Rights Study <[datarightsstudy@cr.org](mailto:datarightsstudy@cr.org)>;   
**Subject:** Re: Incoming Do Not Sell requests from Consumer Reports - Acxiom – CCPA California Consumer Inquiry Procedures



Hope you had a good weekend. We're back at it with authorized agent testing today:

<https://www.acxiom.com/ca-authorized-agent/?optout=access>

Can you help us verify the Consumer Reports organization as an authorized agent? The web forms we're seeing assume a human agent (with a first, middle and last name, DOB, etc). But our volunteers have designated the Consumer Reports organization as an authorized agent, not any individual who works here. Is there a separate flow for agent organizations to verify?

If it's easier to chat through this on the phone, happy to do that too. I'm 404-550-7055.

Thanks again for your help with this --

Ginny


Email \*

Please enter a current email address. We will use this email address to communicate with you about this request.

First Name \*  Middle Name

Last Name \*  Suffix

Select request type \*  
**Authorized Agent**

I'm not a robot  reCAPTCHA  
Privacy - Terms

### Additional Information

Before we begin please complete the following additional fields:

Month of Birth \*  Year of Birth \*

Street Address \*

City \*

State \*  Zip \*

[Cancel](#)

On Thu, Oct 22, 2020 at 1:03 PM consumeradvo - Consumer Advocate <consumeradvo@acxiom.com> wrote:

Opting out at Acxiom is different than an individual exercising their CCPA options. Possibly it might help to have a conversation about what you are actually attempting to test and hope to accomplish? You can reach me at 501.733.5254 at any time today.

The Acxiom opt out process offers all individuals, where Acxiom has sourced data, the choice about the use of their personal information. In the United States, Acxiom created the opt out process over 40 years +/- ago. Individuals do have opt out options at Acxiom:

- request a form to be mailed to you;
- use the online automated opt out tool;
- or contact Acxiom’s Consumer Care Advocate by phone/email/mail for support

So whether you reside in California or else where in the United States, an individual has the choice to opt out at Acxiom. The information that is submitted for suppression is only used for suppression purposes and suppression files at Acxiom do not expire. If you wish to test the Acxiom opt out process, then I am not sure it is necessary for you to become a 3<sup>rd</sup> Party Authorized Agent, although we could make that happen.

2020 CCPA is different in scope then the Acxiom Opt Out process, as it is offering California residents Access to their personal information or “Right to Know” and/or Deletion of their personal data or “Right to Delete”.

By you choosing the Opt Out button, the automated online tool opt out button was provided for any individuals who are non-CA residents and didn’t realize the limitation, or possibly individuals who at this time were unable to verify their identity within the conditions set within the CCPA standards.

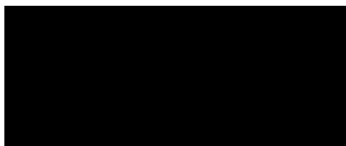
Please contact me if you wish to discuss further.



Acxiom Privacy Team



TEL [Redacted]  
TEL [Redacted]



[acxiom.com](https://www.acxiom.com)



**From:** [Redacted] > **On Behalf Of CR Data Rights Study**

**Sent:** Thursday, October 22, 2020 9:42 AM  
**To:** consumeradvo - Consumer Advocate <[consumeradvo@acxiom.com](mailto:consumeradvo@acxiom.com)>  
**Cc:** Ginny [REDACTED]  
**Subject:** Re: Incoming Do Not Sell requests from Consumer Reports - Acxiom – CCPA California Consumer Inquiry Procedures

[REDACTED]

Appreciate the detailed instructions. We are trying to submit an Authorized Agent data opt out request, not a data access request.

I thought there would be a path to do this starting from Step 3 of your instructions.

1. Instead of pressing "Access" we pressed "Opt Out" on <https://www.acxiom.com/caconsumer/>

To exercise your rights, please select from one of the options below:

- **Opt-Out Request:** If you would like to have your data removed from Acxiom's US marketing data products.
- **Access Request:** If you would like to receive your Right to Know Consumer Access Report.
- **Deletion Request:** If you would like Acxiom to delete your data from their US marketing data products.

[OPT OUT →](#)   [ACCESS →](#)   [DELETION →](#)

2. This took us to <https://isapps.acxiom.com/optout/optout.aspx> where Section 3 is relevant for agents:

### 3/ For Whom is this Opt Out Request Process Intended?

Acxiom's US Online Opt Out Request Process is intended for individual consumer use. "Authorized Agents" under the California Consumer Privacy Act should adhere to a special process, described [here](#).

Acxiom will accept opt outs from qualified third parties. To obtain a copy of Acxiom's third-party qualification criteria, please send an email to [consumeradvo@acxiom.com](mailto:consumeradvo@acxiom.com)

3. When we click on "here" to learn about the special process for agents, we are taken to the "for consumers page" <https://www.acxiom.com/data-privacy-ethics/california-consumer-privacy-act/for-consumers/> . And now in the Authorized Agent section, we're back to needing to submit via the online consumer portal <https://www.acxiom.com/caconsumer/>

For the safety and security of the consumer's information, requests for deletion and Consumer Access Reports submitted to Acxiom by an authorized agent will require a direct method of communication, preferably a valid email address, with the consumer, to fulfill the request.

All authorized agents will be required to successfully complete the minimum requirements for individual identity verification as stated [here](#) prior to being authorized by Acxiom to submit requests on behalf of a consumer.

All requests from authorized agents may be submitted using our online consumer portal found [here](#).

#### AGENT AUTHORIZATION VERIFICATION

In addition to the individual identity verification procedure described above, authorized agents will be required to submit the following written documentation:

**Businesses** – if you are operating as a business, the following documentation is required:

4. Now we're back at step #1.

Does your flow allow agents to issue opt out requests? What am I missing?

Thanks,

Ginny

On Wed, Oct 21, 2020 at 5:38 PM consumeradvo - Consumer Advocate <[consumeradvo@acxiom.com](mailto:consumeradvo@acxiom.com)> wrote:

Good afternoon Ginny, you were headed in the correct direction and were almost to the request form.

Below I have provided you with step by step instructions and screen shots:

1. <https://www.acxiom.com/data-privacy-ethics/california-consumer-privacy-act/for-consumers/>
2. Click: "Requirement for Use of Authorized Agent" and go to section that reads:

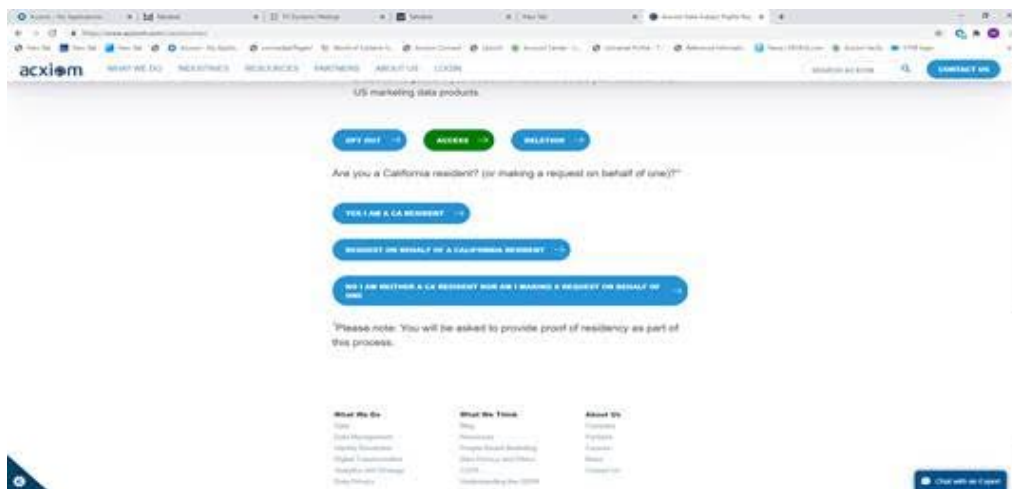
All requests from authorized agents may be submitted using our online consumer portal found [here](#).

3. You arrive at "Acxiom Data Subject Rights Request" now please scroll to the bottom of page and you will find three buttons:

1. Opt Out
2. Access
3. Deletion

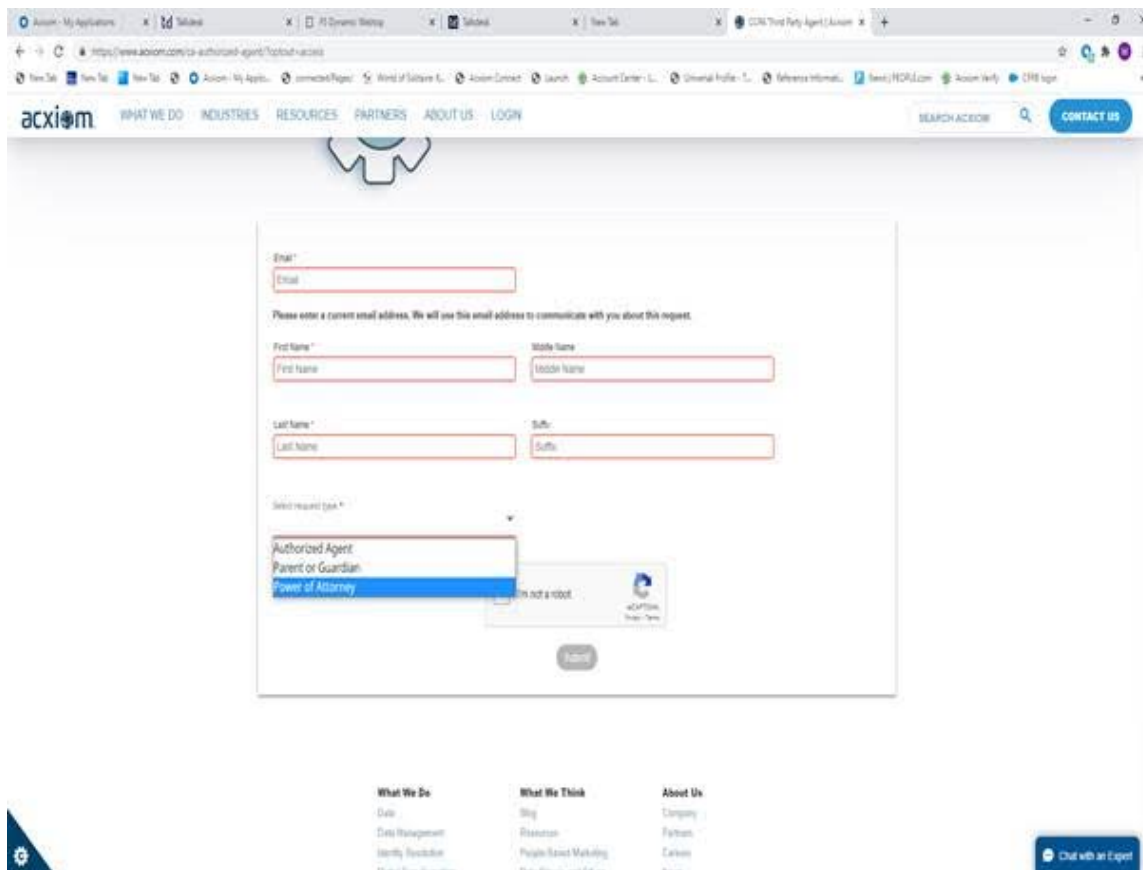
If you choose the Access button (shown below) a drop down box appears with multiple choices.

- If you wish to register as a California resident, making your own CCPA request you choose the first button
  1. If each of the testers would rather submit their own request, then this would be the choice for either Access or Delete
- If you wish to register as a CCPA Third party Agent at Acxiom, then you would choose: “Request on Behalf of a California Resident”



4. The choice for “CCPA Third Party Agent” produces the following form:

1. Within the form is a “Select Request Type” that contains a drop down box with three options:
  - Authorized Agent
  - Parent or Guardian
  - Power of Attorney





Please do not hesitate to let me know if you have any additional questions.

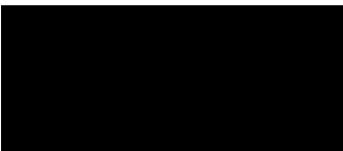
Thank you!



Acxiom Privacy Team



TEL [Redacted]  
TEL [Redacted]



[acxiom.com](http://acxiom.com)



**From:** Ginny [Redacted]

**Sent:** Wednesday, October 21, 2020 3:17 PM

**To:** consumeradvo - Consumer Advocate <[consumeradvo@acxiom.com](mailto:consumeradvo@acxiom.com)>

**Cc:** CR Data Rights Study <[datarightsstudy@cr.org](mailto:datarightsstudy@cr.org)> [Redacted]

**Subject:** Re: Incoming Do Not Sell requests from Consumer Reports - Acxiom – CCPA California Consumer Inquiry Procedures



Thanks for looking into this. The issue is that the agent link you provide goes back to the consumer page, so we're getting trapped in circular logic. See below for the flow we're caught in. And thanks again for prioritizing a fix - it would be great if you could let us know when would be a good time to try again.

Best,

Ginny

**Consumer Reports authorized agent experience**

1. We clicked the link you provided via email "If however you wish to review the Acxiom website on CCPA or learn how to verify as an Authorized Agent, then please consider using this link located on our Acxiom web

- site – <https://www.acxiom.com/data-privacy-ethics/california-consumer-privacy-act/for-consumers/>"
- 2. In "Requirement for Use of Authorized Agent" section: "All requests from authorized agents may be submitted using our online consumer portal found here <<https://www.acxiom.com/caconsumer/>>." <-- this link goes to the consumer page
- 3. In section 3/ ""Authorized Agents" under the California Consumer Privacy Act should adhere to a special process, described here<<https://www.acxiom.com/what-we-are-thinking/california-consumer-privacy-act/for-consumers/>>." <-- takes us back to where we started

On Wed, Oct 21, 2020 at 12:53 PM consumeradvo - Consumer Advocate <[consumeradvo@acxiom.com](mailto:consumeradvo@acxiom.com)> wrote:

Good morning,

Thank you for your patience and we are sorry for any inconvenience you might have experienced. When I found your message this morning I immediately contacted the technical support team with your findings. In our testing this morning, the site and submissions are working for us. To replicate what you are experiencing, would you please send us a screen shot of what you are seeing?

Thank you in advance for this requested information and I will be back in touch just as soon as I have additional information.

Respectfully,



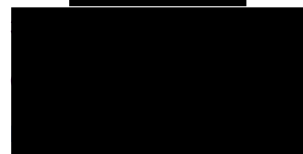
Acxiom Privacy Team



TEL



TEL



[acxiom.com](https://www.acxiom.com)



**From:** [Redacted] **On Behalf Of** CR Data Rights Study

**Sent:** Tuesday, October 20, 2020 7:50 PM

**To:** consumeradvo - Consumer Advocate <[consumeradvo@acxiom.com](mailto:consumeradvo@acxiom.com)>

**Cc:** Ginny [Redacted]

**Subject:** Re: Incoming Do Not Sell requests from Consumer Reports - Acxiom – CCPA California Consumer Inquiry Procedures

Hello,

Thanks very much for your response and the overview of your agent process. We intend to send the requests this week, but unfortunately the link you provided to your consumer portal for agents is broken. Is there another link or workflow we can use to submit requests instead?

Thank you,

Ginny

On Tue, Oct 6, 2020 at 5:26 PM consumeradvo - Consumer Advocate <[consumeradvo@acxiom.com](mailto:consumeradvo@acxiom.com)> wrote:



Hello Ginny and the Consumer Reports Digital Lab Team,

I am the Consumer Care Advocate for the Acxiom Privacy & Data Ethics Team and I am in receipt of your inquiry.

Thank you very much for the opportunity to reply. While we did receive your email dated, October 5, 2020, I have not seen the email you mentioned that was sent on Friday, September 25<sup>th</sup>, 2020. If you would, please forward that email on to me so we can better understand why it wasn't identified.

As to your request to experiment with the CCPA process at Acxiom, we welcome that activity. Below please find the overview and appropriate link for individuals to utilize if they wish to exercise their California options and submit a request. If however you wish to review the Acxiom website on CCPA or learn how to verify as an Authorized Agent, then please consider using this link located on our Acxiom web site – <https://www.acxiom.com/data-privacy-ethics/california-consumer-privacy-act/for-consumers/> . Please do not hesitate to let me know if you have any questions. Thank you,

Thank you for your recent request pursuant to the California Consumer Privacy Act (CCPA). We appreciate the opportunity to respond.

The California Consumer Privacy Act ("CCPA" or the "Act") confers new privacy rights for California consumers and imposes corresponding obligations subject to the Act. The rights conferred to consumers include:

- the "Right to Know" what personal information covered businesses are collecting about consumers and how that information is being used and shared;
- the "Right to Delete" personal information held by covered businesses;
- the right to stop the sale of personal information by covered businesses, and the right to non-discrimination in service and price when exercising privacy rights.

Information regarding the CCPA options is available to you on the Acxiom web site, located at: [here](#)

Information regarding the CCPA Privacy Notice and consumer’s rights is available to you on Acxiom’s web site, located at: [here](#)

In the event you have additional questions regarding your rights under CCPA or Acxiom’s data collection, use and disclosure practices, you may contact us by phone, mail, or email:

Our telephone number is 1-877-774-2094.

Our email address is [consumeradvo@acxiom.com](mailto:consumeradvo@acxiom.com) .

Our mailing address is:

Acxiom LLC

Consumer Care Advocate

CWY0902-21

Attention: CCPA Requests

301 Dave Ward Dr.

P.O. Box 2000

Conway, AR 72033

You may also contact the California Attorney General. Please visit their website at <https://www.oag.ca.gov/> , for more information.

Respectfully,

**US PRIVACY & DATA ETHICS**

[Consumer Care Advocate](#)



TEL 501.342.3122

TEL 877.774.2094

301 E. Dave Ward Dr.

Conway, AR 72032

[ConsumerAdvo@acxiom.com](mailto:ConsumerAdvo@acxiom.com)

[acxiom.com](http://acxiom.com)



**From:** [Redacted] **On Behalf Of** CR Data Rights Study  
**Sent:** Monday, October 5, 2020 10:45 AM  
**To:** Ginny [Redacted]  
**Subject:** Incoming Do Not Sell requests from Consumer Reports

Hello,

I haven't heard from you, so wanted to make sure you received this note originally sent on Friday, Sept 25 --

I am reaching out on behalf of Consumer Reports, the non-profit member organization. We are conducting

an experiment as part of our work to strengthen consumer privacy rights under the California Consumer Privacy Act (CCPA).

As you know, the CCPA gives California consumers the right to request that companies stop selling their personal data to advertisers and other third parties—known as an opt-out or “Do Not Sell” request. These requests can be issued by individuals or by an “Authorized Agent” that a consumer designates to issue requests on their behalf (pursuant to §999.326).

Next month, Consumer Reports will issue a limited number of Do Not Sell requests on behalf of a small volunteer group. The purpose of this experiment is to better understand how companies are fulfilling their obligations to honor Do Not Sell requests issued by an Authorized Agent, and what workflows companies use to process these requests.

We have selected you as one of our test companies. This means that in early October, we will contact you to transmit approximately ten Do Not Sell requests on behalf of consumers who have designated Consumer Reports as their Authorized Agent. These requests will be delivered as attached PDF files and will include:

- Opt-out request
- Proof that we have conducted email and SMS verification
- Written permission letter establishing permission for CR to act as an agent for this consumer
- Certificate of Information for Consumer Reports, which shows that we are registered to conduct business in California
- Under the CCPA, you have 15 business days to process these requests. We would appreciate receiving a confirmation or resolution notice from you once the requests have been processed.

**We are eager to hear from you about your approach to CCPA compliance, as well as the practical and technical considerations your enterprise must consider when processing valid CCPA requests from an Authorized Agent.** For instance, if there is a particular format you’d like us to deliver requests in, please let us know and we will do our best to oblige.

**We would also welcome the opportunity to connect by phone to discuss this experiment and CCPA compliance more broadly.** If that is of interest, let me know and we can arrange a time to chat.

Thank you for your attention and for your work to honor consumer data rights.

Best,  
Ginny and the Consumer Reports Digital Lab team

\*\*\*

This e-mail message is intended only for the designated recipient(s) named above. The information contained in this e-mail and any attachments may be confidential or legally privileged. If you are not the intended recipient, you may not review, retain, copy, redistribute or use this e-mail or any attachment for any purpose, or disclose all or any part of its contents. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and permanently delete this e-mail and any attachments from your computer system.

\*\*\*

\*\*\*\*\*  
The information contained in this communication is confidential, is intended only for the use of the recipient named above, and may be legally privileged.

If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited.

If you have received this communication in error, please resend this communication to the sender and delete the original message or any copy of it from your computer system.

Thank You.

\*\*\*\*\*

\*\*\*

This e-mail message is intended only for the designated recipient(s) named above. The information contained in this e-mail and any attachments may be confidential or legally privileged. If you are not the intended recipient, you may not review, retain, copy, redistribute or use this e-mail or any attachment for any purpose, or disclose all or any part of its contents. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and permanently delete this e-mail and any attachments from your computer system.

\*\*\*

\*\*\*

This e-mail message is intended only for the designated recipient(s) named above. The information contained in this e-mail and any attachments may be confidential or legally privileged. If you are not the intended recipient, you may not review, retain, copy, redistribute or use this e-mail or any attachment for any purpose, or disclose all or any part of its contents. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and permanently delete this e-mail and any attachments from your computer system.

\*\*\*

\*\*\*

This e-mail message is intended only for the designated recipient(s) named above. The information contained in this e-mail and any attachments may be confidential or legally privileged. If you are not the intended recipient, you may not review, retain, copy, redistribute or use this e-mail or any attachment for any purpose, or disclose all or any part of its contents. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and permanently delete this e-mail and any attachments from your computer system.

\*\*\*

\*\*\*

This e-mail message is intended only for the designated recipient(s) named above. The information contained in this e-mail and any attachments may be confidential or legally privileged. If you are not the intended recipient, you may not review, retain, copy, redistribute or use this e-mail or any attachment for any purpose, or disclose all or any part of its contents. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and permanently delete this e-mail and any attachments from your computer system.

\*\*\*

\*\*\*

This e-mail message is intended only for the designated recipient(s) named above. The information contained in this e-mail and any attachments may be confidential or legally privileged. If you are not the intended recipient, you may not review, retain, copy, redistribute or use this e-mail or any attachment for any purpose, or disclose all or any part of its contents. If you have received this e-mail in error, please immediately notify the sender by reply e-mail and permanently delete this e-mail and any attachments from your computer system.

\*\*\*