



March 27, 2026

California State Senate
Committee on Privacy, Digital Technologies, and Consumer Protection
1020 N Street, Room 568
Sacramento, CA 95814
SPDTCP.Committee@sen.ca.gov (via portal)

Re: SB 923 (Becker) – SUPPORT

Dear Honorable Senators,

Consumer Reports¹ and the Electronic Privacy Information Center write to express their strong support for SB 923, which would expand consumers’ right to delete information under the California Consumer Privacy Act (CCPA) to any personal information a business holds about them. SB 923 would also require online-only businesses to provide an intuitive online webform to submit deletion requests.

Today, the CCPA is an outlier from most other state privacy laws that allow consumers to delete all data that a company has about them — not just data that a consumer provided them directly. For example, Connecticut, whose privacy law has served as a model for several other states, provides that a consumer has the right to “delete personal data provided by, *or obtained about*, the consumer” (emphasis added).² As such, California’s data deletion laws are arguably the weakest among those states that have adopted data privacy laws.

These concerns are not abstract for countless Californians. Businesses today routinely augment consumer records with data purchased from third parties to enhance targeting, personalization, and profiling. For example, a retail company might collect basic information directly from the

¹ Founded in 1936, Consumer Reports (CR) is an independent, nonprofit and nonpartisan organization that works with consumers to create a fair and just marketplace. Known for its rigorous testing and ratings of products, CR advocates for laws and company practices that put consumers first. CR is dedicated to amplifying the voices of consumers to promote safety, digital rights, financial fairness, and sustainability. The organization surveys millions of Americans every year, reports extensively on the challenges and opportunities for today’s consumers, and provides ad-free content and tools to 6 million members across the U.S.

consumer and then purchase detailed demographic data, purchasing histories, and other behavioral information from data brokers to create a rich profile used for marketing and pricing decisions. The CCPA's current right to delete, which gives Californians the right to request that a business delete the personal information collected directly from them, may create a false sense of protection by failing to address the full scope of data a company may hold and use to make decisions about individuals. Additionally, it may make businesses more vulnerable to security incidents like data breaches even after a consumer has taken steps to protect the privacy and security of their information.

Additionally, under the CCPA, online-only businesses that have a direct relationship with the consumer are only required to provide an email address for consumers to submit most privacy requests, such as requests for access, deletion, or correction. This single-method requirement creates barriers for consumers as it offers minimal support or guidance.

SB 923 would make it easier for consumers to exercise their privacy rights by requiring online-only businesses to also provide a web form for submitting privacy requests. This would make privacy rights more accessible to consumers regardless of technical ability or legal expertise. Streamlined forms or portals would also increase efficiency for businesses by ensuring all necessary information is provided upfront.

For these reasons, we respectfully request an "aye" vote on SB 923.

Sincerely,

Justin Brookman
Director, Technology Policy
Consumer Reports

Caitriona M. Fitzgerald
Deputy Director
Electronic Privacy Information Center