

## NIESAR & VESTAL LLP

### Law Alert

December 15, 2025

### California's Delete Act: Data Brokers Must Prepare for Centralized Deletion Portal Launch

[The Delete Act](#) (SB 362), signed into law in October 2023, imposes new obligations on California data brokers, including annual registration, expanded disclosure requirements, and—beginning in 2026—mandatory use of a centralized system for processing consumer deletion requests.

On October 21, 2025, the California Privacy Protection Agency (CPPA) launched a [webpage](#) previewing the Data Rights Opt-out Portal (DROP). This centralized platform will allow consumers to request deletion of their personal information from all registered data brokers through a single submission, fulfilling the Delete Act's mandate.

Beginning January 1, 2026, consumers will be able to authenticate once and submit a single request to every registered data broker through DROP. CPPA designed the platform to minimize the personal information the platform collects and to store all submitted information in an unreadable format used solely for deletion matching.

Beginning August 1, 2026, data brokers must access DROP at least once every 45 days to retrieve and process new deletion requests, creating a recurring compliance obligation.

Under the Delete Act, a data broker is a “**business that knowingly collects and sells the personal information of a consumer with whom the business does not have a direct relationship.**” According to the adopted regulations, a “business does not have a ‘direct relationship’ with a consumer simply because it collects personal information directly from the consumer; the consumer must intend to interact with the business.” There is no revenue threshold or exemption for companies that only sell a portion of their data.

Data brokers should review the CPPA's DROP preview [webpage](#) and establish processes to handle incoming requests efficiently. Proactive planning now will prevent operational disruptions and regulatory issues when the portal launches.

Fines for failing to register are set by law at \$200/day and failure to delete a consumer's information are \$200/day per consumer plus enforcement costs.

Organizations uncertain about their data broker status should consult with privacy counsel to assess their obligations under the Delete Act regime.

If you have any questions regarding the above-mentioned Act or its implementation, please feel free to contact [Carolina Aricu \(caricu@nvlawllp.com\)](mailto:Carolina Aricu (caricu@nvlawllp.com)).

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