Is Your Business in Need of a CCPA Intervention?

Are you a for-profit entity?

- **YES**
  - Do you collect California residents’ “personal information”?
    - **NO**
      - Are you controlled by or do you control another for-profit entity?
        - **NO**
          - Do you receive personal information of 50K or more California consumers, households, or devices for commercial purposes?
            - **YES**
              - Alright, you sound pretty certain. Does your business derive 50% or more of its business from “selling” California residents’ personal information?
                - **YES**
                  - You Need a CCPA Intervention!
                - **NO**
                  - Are you sure? We know 50K sounds like a lot, but you’d be surprised how easy it is to meet this threshold.
                    - **NO**
                      - OK - you answered that way too quickly. “Sale” is defined really broadly under the CCPA. Have you already consulted with outside counsel about this matter?
                        - **YES**
                          - You Need a CCPA Intervention!
                        - **NO**
                          - NOT SURE, ACTUALLY
            - **NO**
              - Are you sure you’re not collecting any California residents’ personal information?
                - **NO**
                  - That’s OK! You’ll get there one day!
                - **YES**
                  - It’s really broad! Are you sure you’re not collecting any California residents’ personal information?
                    - **NOT SURE, ACTUALLY**
                      - You Need a CCPA Intervention!
                    - **YES**
                      - Alright, you sound pretty certain. Does your business derive 50% or more of its business from “selling” California residents’ personal information?
                        - **YES**
                          - You Need a CCPA Intervention!
                        - **NO**
                          - Are you sure? We know 50K sounds like a lot, but you’d be surprised how easy it is to meet this threshold.
                            - **NO**
                              - OK - you answered that way too quickly. “Sale” is defined really broadly under the CCPA. Have you already consulted with outside counsel about this matter?
                                - **YES**
                                  - You Need a CCPA Intervention!
                                - **NO**
                                  - NOT SURE, ACTUALLY
            - **NO**
              - Do you have annual gross revenues in excess of $25 million?
                - **YES**
                  - Hooray! That’s great! We’re so proud of you!
                - **NO**
                  - OK. Pay close attention. This might get tricky. You must answer the next set of questions on behalf of each entity you control or are controlled by.
                    - **NOPE, NOT A CLUE**
                      - You Need a CCPA Intervention!
                    - **YES**
                      - That’s OK! You’ll get there one day!
            - **NO**
              - Did you answer the last question on behalf of an entity you control or are controlled by?
                - **YES**
                  - You might not be a covered “business” under the CCPA, but you may have other obligations. Let’s talk.
                - **NO**
                  - Are you controlled by or do you control another for-profit entity?
                    - **YES**
                      - You Need a CCPA Intervention!
                    - **NO**
                      - Do you share common branding?
                        - **NO**
                          - You Need a CCPA Intervention!
                        - **YES**
                          - 200% POSITIVE
                            - NOT SURE, ACTUALLY

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