



CCPA Information for TSD Clients

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Overview

As a processor of data for tens of millions of travelers every year, with clients in more than 70 countries and on six continents, TSD takes its responsibility as a corporate citizen very seriously. Many of our clients who have been researching the California Consumer Privacy Act (CCPA) are interested in learning more about the measures we have taken to comply with its standards. This document is designed to provide an overview of the policies and functionality that we have put in place to help our clients meet their obligations when it comes to data privacy and protection.

Long having upheld the payment card industry's PCI-DSS (Payment Card Industry Data Security Standard) standard, TSD continues its solid tradition of observance of the latest data security requirements and recommendations.

What is CCPA?

The California Consumer Privacy Act, or CCPA, took effect on January 1st, 2020. The goal of this law is to enforce the privacy rights of individuals who reside in the state of California, and to give them the right to know about and control the selling and disclosure of their personal data.

This law applies to any business that collects, then sells or discloses to another party, personal information on California residents. According to the CCPA documents, a "business" refers to *a sole-proprietorship, partnership, limited liability company, corporation, association, or other legal entity that is organized or operated for the profit or financial benefit of its shareholders or other owners, that collects consumers' personal information, that does business in the State of California.*

In a global marketplace, the personal data of citizens of California is likely to be processed in computer systems in any number of states, regardless of whether they travel. Therefore, this law applies to companies that are not based in California but still do business with California residents, or collect information about them in California while they are traveling elsewhere.

The rights outlined in the regulation are as follows:

- **Transparency and Disclosure.** Customers have the right to know what information is being collected about them. Consumers have the right to request this information, and companies must train their employees to comply with these requests.

Furthermore, Customers have the right to know if personal information is sold or disclosed to third parties. If it is, companies must inform consumers of the category of information that is sold and the name of the third-party to which it is sold. Disclosure of consumer information by companies to third parties require an explanation of the reason for the disclosure.

- **Right to Opt Out of the Sale of Personal Information.** Companies must provide consumers a clear way to "opt out" of the sale of their personal information. Consumers may exercise this right at any time.
- **Right to Know.** Companies must clearly disclose information collection activities, including responding to customer information requests. A company's privacy policy must list what information is collected, and what information, if any, is sold.

- **Fairness.** The services rendered to, and prices charged to, a consumer who opts out of having their information sold must be the same as those rendered to or charged to any other consumer.
- **Method to Opt Out of Information Sales.** Companies must actively enable consumers to exercise their rights to request information or opt out by providing a link on their web site. Consumers do not have to create an account to opt out of the sale of their personal information.
- **Right to Erasure.** Consumers can request to have any unused or unnecessary personal information removed from a company's systems.

For more information on the CCPA, refer to the web site of the State of California Department of Justice at <https://www.oag.ca.gov/privacy/ccpa>.

What is TSD's Role in the CCPA?

In the CCPA, the following terms define the entities that are involved in data management:

Business. A business collects the consumer data required to provide a service.

Service Provider. A Service Provider processes information on behalf of a business.

TSD is a Service Provider. Using the software as a service (SaaS) model, TSD provides applications to Car Dealerships and Rental Car Companies, which then provide courtesy car and car rental services to consumers.

The Car Dealerships and Rental Car Companies are the "Businesses" providing services to consumers. It is the responsibility of the Car Dealerships and Rental Car Companies to notify the consumer as to what personal information is being collected, sold, and disclosed, and provide a means to opt out of the sale of consumers' personal data. It is also the responsibility of these companies to provide equal service to consumers regardless of whether they opt out of information sales and disclosure.

Data collected from the consumer may include:

- Name
- Postal Address
- Email Address
- Driver's license number
- Date of Birth
- Phone numbers
- Insurance policy number
- Passport number

TSD as a "Service Provider" provides the capability for a legally binding contract or reservation that contains the consumer's personal information to be stored, generated and delivered to the Consumer. The format and content of the contract is defined by the Car Dealerships and Rental Car Companies. Car Dealerships and Rental Car Companies can utilize these capabilities to provide information to consumers. The Right to Erasure is covered below.

How do TSD Applications Support the CCPA?

TSD is committed to industry best practices when handling sensitive data. As a service provider, TSD is concerned with the CCPA principle below.

Right to Erasure

When a data subject requests that his or her data be corrected in the system, functionality is available to correct personal data on a profile, reservation or agreement.

As dictated by CCPA, TSD supports the “right to erasure” of consumer data by allowing a Car Dealership or Rental Car Companies representative to remove a consumer’s private information and retain only what is legally required to provide the service.

Additional Considerations

Integrity and confidentiality

TSD uses a variety of methods to protect information against unlawful processing or access, including:

- All PII data is encrypted in transit, processing and at rest
- Database and data field encryption
- Masking of PII (Personally Identifiable Information) fields for all users by default
- Designated access privileges for viewing of different categories of PII data
- Incident response plans
- Vulnerability assessments
- Penetration tests
- Data Security Policy implementation
- Employee Security Awareness Training

Data Minimization and Storage Limitation

TSD purges quote, reservation, agreement, unit, and preferred renter data according to its data retention policies. Personal data from outdated records that have not been used to create legally binding contracts is also purged regularly.