Friday, November 21, 2025 – 12:00 – 1:30 p.m.

CPPA Finalizes New Regulations Addressing Cybersecurity Audits, ADMT and Privacy Risk Assessments

The California Consumer Privacy Act (CCPA) is one of the most comprehensive privacy statutes in the United States. It has been amended numerous times since it was first passed back in 2018, with recent regulatory developments this year.

A final version of regulations implementing the CCPA became final on March 29, 2023. However, the California Privacy Protection Agency (CPPA) was also required to issue regulations that address the following topics: (i) cybersecurity audits; (ii) privacy risk assessments (PRA); and (iii) regulations governing access and opt-out requirements when a business uses "automated decision-making technology" (ADMT). The CPPA has been going through a prolonged rulemaking process to issue these regulations that has lasted almost two years. On November 22, 2024, the CPPA issued proposed regulations to address these requirements.

On September 22, 2025, the California Office of Administrative Law (OAL) formally approved the CPPA's rulemaking package to update the CCPA regulations to address cybersecurity audits, PRAs and ADMT requirements ("2025 CCPA Regulations"). The new requirements imposed under the 2025 CCPA Regulations could create significant new compliance burdens on many financial institutions. While the 2025 CCPA Regulations are set to become effective on January 1, 2026, the CPPA is giving companies extended compliance deadlines by which to comply with its requirements.

Please join us at the November Monthly Telephone Briefing where we will discuss the 2025 CCPA Regulations in detail.

California's Climate Disclosure Laws: Where Things Stand

In 2023, California enacted two separate bills requiring large corporations, including financial institutions, to disclose their carbon footprints and their climate-related financial risk.

The first bill, California Senate Bill 253 (SB 253), titled the "Climate Corporate Data Accountability Act" ("CCDA Act"), applies to companies conducting business in California with annual revenues exceeding $1 billion. The CCDA Act requires covered entities to report their Scope 1, 2, and 3 emissions on an annual basis to the California Air Resources Board ("CARB"). Under the CCDA Act, covered entities are required to begin reporting all Scope 1 and 2 emissions for the entity's prior fiscal year beginning in 2026 on a date to be set by CARB.

The legislature also enacted California Senate Bill 261 (SB 261), titled "Greenhouse Gases: Climate-related Financial Risk," which applies to companies with annual revenues exceeding $500 million doing business in California. SB 261 requires these corporations to prepare a climate-related financial risk report disclosing the entity's climate-related financial risk and its measures adopted to reduce and adapt to climate-related financial risk (the "CRFR Disclosure"). SB 261 requires the CRFR Disclosure to be posted to the entity's website by January 1, 2026.

While CARB was initially expected to issue regulations to implement these laws by October 14, 2025, they recently announced that regulations would not be issued until the first quarter of 2026. However, the delay in CARB's regulations do not otherwise change the statutory reporting deadlines. As such, covered entities will still be expected to comply with statutory reporting deadlines despite the lack of regulations issued by CARB.

Please join us at the November Monthly Telephone Briefing when we will discuss where things currently stand with California's climate disclosure laws, who is covered, the applicable compliance deadlines, and more.

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* Janet Bonnefin has retired from the firm

Aldrich & Bonnefin is hosting a Monthly Telephone Briefing for Bankers' Compliance Group® Members on **Friday, November 21, 2025, at 12 Noon.** This meeting will be presented live and will include several question and answer sessions. Members can ask questions by telephone or email. Each Member that registers for the Monthly Telephone Briefing will be given a password and instructions on how to join the Briefing.

ORGANIZE YOUR PARTICIPANTS

BCG Main or Registration Contacts are encouraged to organize multiple attendees to participate at one or more locations. All Briefing connections are included in your BCG Membership.

REGISTRATION

To register, please contact your institution's BCG Main or Registration Contact or, if authorized, log in at **http://register.bankerscompliancegroup.com/subadmin**, and select "Register for Events." Registration closes at noon **two business days** prior to the Briefing date. On the day before the Briefing, registrants will receive an email with call-in instructions and a single-use PIN.

DOWNLOAD THE HANDOUTS

The Handout(s) are *generally* posted on the BCG Website by noon on the business day before the Briefing. All registrants will receive an email notification when the Handout(s) are posted. To download a Handout, go to **www.bankerscompliancegroup.com/monthly-telephone-briefing.php** and click on the "*Download Handout Here*" link at the end of each Handout description.

CANCELLATION

It is not necessary for registrants to contact BCG if they cannot attend a Briefing and need to cancel their registration.

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