Quarterly Enforcement Report: The Oregon Consumer Privacy Act (2024), January-March 2025

ORS 646A.570-646A.589

April 2025

Introduction

The "Oregon Consumer Privacy Act," or the OCPA, <u>ORS 646A.570-646A.589</u> is Oregon's comprehensive consumer privacy law, which took effect on July 1, 2024. As part of the Privacy Unit's¹ efforts for continued transparency, this is the first quarterly report of 2025, covering January 1, 2025-March 31, 2025.

This Report provides an abbreviated overview of 1) the Oregon Department of Justice's implementation and outreach, 2) consumer privacy complaints, 3) and enforcement efforts. For a more detailed report, please see our <u>OCPA Six-Month Enforcement Report</u>, published in February of 2025, and covering July 1, 2024-December 31, 2024. For more resources regarding the OCPA, please visit DOJ's <u>Consumer Privacy Webpage</u>.

Implementation & Outreach Efforts

Since January 1, 2025, the Privacy Unit has continued outreach by engaging with community stakeholders. This has included attending Lewis and Clark Law School's 6th Annual Data Privacy Symposium and a privacy community networking event, both in Portland. Additionally, we have released a new online toolkit for Oregon families to protect their data,² which includes a "how to" guide for making privacy rights requests.

Consumer Privacy Complaints

The Privacy Complaint Portal is a webform located on the Consumer Privacy Webpage. This portal is designed to allow consumers to make complaints about businesses that are not honoring their privacy rights requests. The

¹ The Privacy Unit is situated within the Civil Enforcement Division of the Department of Justice, and is housed within the recently formed Antitrust, False Claims, and Privacy Section.

² Take Action Online to Protect Your Privacy Rights - Oregon Department of Justice : Media

Total submissions: 157



Privacy Unit intakes consumer complaints and evaluates the referenced businesses for potential OCPA violations.

As of March 31, 2025, the Privacy Unit has received 157 complaints total, 47 of those complaints are from the last quarter of January-March 2025. Those are in addition to over 250 complaints from Oregonians regarding the treatment of consumer data by the Department of Government Efficiency (DOGE).

Overall, the DOJ has received the most complaints about social media/technology platforms and data brokers. This quarter, consumers are particularly concerned about how government

entities are handling their personal data. The first chart shows the trends this quarter, where consumer complaints centered on government actions. The second chart shows long-term consumer complaint trends from July 2024-March 2025, which highlight data brokers and social media companies.



Number of Consumer Complaints

Jan. 1, 2025 - Mar. 31, 2025

Number of Consumer Complaints

July 1, 2024 - March 31, 2025



The number one privacy right consumers have requested and been denied, is still the right to delete their data.

Continued Enforcement- Cure Period

The cure letter is the primary method by which the Privacy Unit enforces initially identified violations under the Oregon Consumer Privacy Act. As explained in our Six-Month Enforcement Report, the cure letter is mandated by the OCPA until January 1, 2026, if the potential violation(s) are curable, or fixable. Sometimes we receive a consumer complaint or become aware of a potential privacy issue through public reporting, and upon review of a company's Privacy Notice, we identify violations that require a cure

In the first quarter of 2025, the Privacy Unit continued to send cure letters to companies whose publicly available privacy notices were not compliant with the OCPA, as well as inquiry letters to companies, requesting more information about their privacy practices. Inquiry letters are generally sent in response to a consumer complaint. We also sent letters with both cure and inquiry components.

The OCPA gives companies a 30-day window to cure violations. Therefore, it can take some time to resolve cure issues with companies. Between January 1, 2025, and March 31, 2025, we closed eleven cure letter matters (including inquiry letters). This means that those companies addressed the OCPA issues identified by DOJ.