TAB 6
February 25, 2022
Road Charge TAC
Meeting

## SENATE BILL 339 RESEARCH FOR DESIGN RECOMMENDATIONS

California Transportation Commission

## PRIVACY & SECURITY RECOMMENDATIONS

## PRIVACY & SECURITY

- The 2017 pilot privacy and security recommendations still seem relevant to the SB 339 pilot.
- Senate Bill 339, section 3092.5(g) maintains the minimum data necessary requirements from the original 2017 pilot.



Several of the 2021 privacy and security recommendations are applicable to the SB 339 pilot.

- Involve legal early in design.
- Include decisions about when it is ok to share personal information in the privacy policy and use the "minimum necessary" principle.
- Require account manager compliance with privacy policy.
- Require account managers to destroy personally identifiable information after 30 days.
- Review mileage to determine whether fraud is likely.

## QUESTIONS?