

Quarterly Enforcement Report: The Oregon Consumer Privacy Act (2024), July-September 2025

ORS 646A.570-646A.589

October 2025

Introduction

The “Oregon Consumer Privacy Act,” or the OCPA, [ORS 646A.570-646A.589](#) is Oregon’s comprehensive consumer privacy law, which took effect on July 1, 2024 for businesses and July 1, 2025 for nonprofits. As part of the Privacy Unit’s¹ efforts for continued transparency, this is the third quarterly report of 2025, covering July 1, 2025-September 30, 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 [OCPA One Year Report](#), published in August of 2025, and covering July 1, 2024- March 31, 2025. For more resources regarding the OCPA, please visit DOJ’s [Consumer Privacy Webpage](#).

Implementation & Outreach Efforts

The Privacy Unit has continued outreach to businesses and nonprofits, including materials for OCPA amendments from the 2025 Legislative Session. For example, website materials have been updated to reflect [HB 3875](#), which went into effect in September 2025. Because of that amendment, the OCPA now applies to all vehicle manufacturers regardless of thresholds, and some of their affiliates, that collect the personal data of Oregon consumers.

Additionally, the Privacy Unit is developing resources for consumers and businesses/nonprofits regarding [HB 2008](#), which prohibits the sale of two categories of data: all data of children under 16 and the specific geolocation data of any Oregonian. Those materials will be available on the Consumer Privacy Website prior to January 1, 2026, when the amendment takes effect.

Finally, as of January 2026, the OCPA’s universal opt out provision will be in force. Under the current version of the OCPA, consumers must manually make opt out choices by submitting a separate request to each entity. The universal opt out provision will allow consumers to install, and require businesses to recognize, a “signal” or code

¹ The Privacy Unit is situated within the Civil Enforcement Division of the Department of Justice and is now housed within the Economic Justice Section.

to automatically indicate what the consumer's preference is. This is already a requirement under several states' privacy laws, and Oregon is working on a public education campaign to help Oregonians understand this technology.

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

As of September 30, 2025, the Privacy Unit has received 265 complaints in total; 51 of those complaints are from the last quarter of July-September 2025. We encourage consumers to continue to make complaints if they encounter issues in requesting their privacy rights.

Enforcement Changes

The cure letter has been the primary method by which the Privacy Unit enforces initially identified violations under the OCPA. A cure letter is sent to entities if the potential violation(s) are curable, or fixable, giving companies a 30-day window to fix those violations. The Privacy Unit has continued to send cure letters in the third quarter of 2025. However, the cure period expires on January 1, 2026. After that date, the Privacy Unit is not legally required to provide businesses with an opportunity to fix alleged violations before taking enforcement action. Businesses should expect that Oregon DOJ may use other methods to address OCPA non-compliance, including serving Civil Investigative Demands.

Enforcement may also include coordinated action by Oregon with the Consortium of Privacy Regulators, which recently added two state members. The Consortium of Privacy Regulators is a bipartisan group of states who collaborate on implementing and enforcing their state privacy laws, with the goal of sharing resources and protecting consumers.