Edgar Vargas

Associate

Orange County

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Edgar helps clients confidently navigate the complexities of new and emerging technologies through the strategic use of data and proactive risk management. With a forward-thinking approach, he provides clarity and solutions throughout his clients' business cycle.

OVERVIEW

Edgar provides comprehensive advice on federal and state privacy and security laws, including broad consumer privacy statutes such as the CCPA and other emerging state frameworks, as well as compliance with federal regulations such as CAN-SPAM and HIPAA. He helps clients to develop and refine key policies such as privacy, terms of use, and information security protocols. Additionally, Edgar handles all aspects of data governance and technology agreements, including BAAs, EULAs, and statements of work governing data utilization.

Clients appreciate Edgar's decisive guidance in responding to and mitigating security incidents, trusting his ability to help them implement effective incident response plans during critical times. He also equips organizations with robust preparedness strategies to address and minimize the impact of security breaches.

Edgar helps clients understand evolving regulatory frameworks and proactively mitigate the associated risks, including the privacy and security implications of cutting-edge technologies such as generative AI. He also supports clients with data privacy and security due diligence in connection with M&A transactions, and assists clients with the protection of their creative and innovative assets through copyrights, trademarks, and trade secrets.

Edgar is fluent in Spanish.

REPRESENTATIVE MATTERS

- Involved in helping a leading cloud software company in a large privacy breach litigation matter, requiring a deep understanding of technology, incident response, and forensics, given the technical facts.
- Serving as counsel for a Software-as-a-Service (SaaS) provider in one of the first class actions alleging CCPA violations and other privacy-based claims.
- Updated and enhanced the data processing addendums for many vendors on behalf of a global company by reviewing countless documents and establishing compliance with California's evolving legal framework.
- Performed a security assessment on behalf of a federal regulator involving a multinational finance company.

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- Analyzed online agreements relating to U.S. and international privacy and security laws and state and federal regulatory schemes involving facial recognition program for a large research organization.
- Supported a U.S.-based financial company involved in a security incident — analyzing facts of the intrusion to identify obligations across state and federal regulations, in addition to any contractual terms.

AWARDS

- Appointed KnowledgeNet co-chair for IAPP, Orange County Chapter (2025)
- Selected as Young Privacy Professional for the International Association of Privacy Professionals (IAPP), Orange County Chapter (2024)

TOP AREAS OF FOCUS

- Incidents + Investigations
- Privacy + Cyber

ALL AREAS OF FOCUS

- Incidents + Investigations
- Litigation + Trial
- Privacy + Cyber

PROFESSIONAL/COMMUNITY INVOLVEMENT

- Orange County Bar Association
- Los Angeles County Bar Association
- International Association of Privacy Professionals

PROFESSIONAL EXPERIENCE

- United States Attorney’s Office, 2018
- Judicial extern, Honorable Daniel A. Flores, San Francisco Superior Court, 2017

EDUCATION AND CERTIFICATIONS

EDUCATION

- University of California College of the Law, San Francisco, J.D., 2019, co-editor-in-chief, *Hastings Science and Technology Law Journal*
- California State University, Long Beach, B.A., 2015

BAR ADMISSIONS

- California

LANGUAGES

- Spanish

SPEAKING ENGAGEMENTS

- Speaker, "A Conversation on CalPrivacy Enforcement," Los Angeles, Orange County, and San Diego KnowledgeNet Chapters Virtual Lunch & Learn, June 11, 2026.
- Panelist, "Benefits of Legal and CISOs Uniting in a Post-Uber and Twitter World," Infosec World, Orlando, FL, September 26, 2023.
- Panelist, CISO/CSO/General Counsel Summit, Converge Security, Anaheim, CA, September 15, 2023.
- Speaker, "Concerns for the Digital Age," Troutman Pepper CLE Webinar, April 19, 2023.
- Speaker, "Beyond a Culture of Fear: The Benefits of Legal and CISOs Uniting in a Post-Uber and Twitter World," MCLE Day, San Francisco, Troutman Pepper, January 24, 2023.
- Panelist, "When the CEO Calls – Part II," Troutman Pepper CLE Webinar, September 29, 2022.
- Speaker, "GDPR – Three Years Later, The Lessons Learned and What's to Come," Troutman Pepper, June 24, 2021.
- Speaker, "Operationalizing the Virginia Consumer Data Protection Act: Leveraging Lessons From the CCPA," 16th Annual Credit and Collection News Conference, April 28, 2021.
- Speaker, "Three Reasons Why 2021 Is a Good Year to Review Your Privacy Compliance Program," Troutman Pepper, March 31, 2021.
- Panelist, "Diverse Perspectives on Careers in Privacy and Cybersecurity," Los Angeles County Bar Association Webinar, February 16, 2021.

PUBLICATIONS

- Co-author, "CCPA Cybersecurity Audit: Part 4 – Whose Name Is on the Line: Risks, Enforcement, and Responsibility," *Privacy + Cyber + AI*, April 22, 2026.
- Co-author, "CCPA Cybersecurity Audits: Part 3 – Where CCPA Cybersecurity Audits Fit Within Existing Security Frameworks," *Privacy + Cyber + AI*, March 26, 2026.
- Co-author, "CCPA Cybersecurity Audits: Part 2 – The 'How' of CCPA Cybersecurity Audits: Operationalizing the Requirements," *Privacy + Cyber + AI*, March 18, 2026.
- Co-author, "CCPA Cybersecurity Audits: Part 1 – The Who, What, and When of CCPA Cyber Audits," *Privacy + Cyber + AI*, March 11, 2026.
- Co-author, "Cyber Incident Response Checklist for SEC Compliance," *Law360*, July 19, 2024.
- Co-author, "2023 Privacy Year in Review," *Troutman Pepper*, February 1, 2024.
- Co-author, "New York: NYDFS Further Enhances Its Cybersecurity Regulations," *OneTrust DataGuidance*, February 2024.
- Co-author, "Iowa on Cusp of Enacting Privacy Legislation," *Troutman Pepper*, March 22, 2023.
- Co-author, "Did You Suffer a Data Breach and What Are Your Notice Obligations?," *Daily Journal*, March 10, 2023.
- Co-author, "The Safeguards Rule: Protecting Information at Financial Institutions," *Thomson Reuters Westlaw*, January 25, 2023.
- Co-author, "Compliance Lessons From Sephora CCPA Settlement," *Law360*, September 13, 2022.
- Co-author, "Not So Pretty: Five Takeaways from New CCPA Settlement with Sephora and Other Enforcements ," *Troutman Pepper*, August 30, 2022.
- Co-author, "California Privacy Protection Agency Publishes Draft Rules," *Troutman Pepper*, June 6, 2022.
- Co-author, "CPRA Series: Part Four – Data Processing Obligation," *Daily Journal*, May 23, 2022.

- Co-author, “Ninth Circuit Provides Guidance on Web Scraping,” *Troutman Pepper*, May 5, 2022.
- Co-author, “Connecticut Legislature Passes Comprehensive Privacy Legislation, Awaiting Governor’s Signature,” *Troutman Pepper*, May 4, 2022.
- Co-author, “Utah Becomes Fourth State to Adopt Privacy Legislation,” *Troutman Pepper*, March 24, 2022.
- Co-author, “2021 Consumer Financial Services Year in Review & A Look Ahead,” *Troutman Pepper*, January 28, 2022.
- Co-author, “New Standard Contractual Clauses Supply Opportunities and Obligations for Organizations Transferring Personal Data Out of the EU,” *Troutman Pepper*, July 22, 2021.
- Co-author, “Introduction and Overview: Virginia Consumer Data Protection Act Series (Part One),” *Troutman Pepper*, March 4, 2021.
- Co-author, “DFS Releases its Cyber Insurance Risk Framework,” Troutman Pepper Consumer Financial Services Law Monitor, February 16, 2021.
- Co-author, “Data Compliance Issues for Cos. Making, Using Vaccine App,” *Law360*, February 10, 2021.
- Co-author, “California Consumer Privacy Act Enforcement Series: Businesses Collecting Children’s Personal Information and Health-Related Data,” *Troutman Pepper*, August 3, 2020.
- Co-author, “The FTC Hosted its Workshop on the Proposed Changes to the Safeguards Rule,” Troutman Pepper Consumer Financial Services Law Monitor, July 20, 2020.
- Co-author, “CISA Shares 5 Ways a Business’s Staff Could Reduce Their Cyber Risks,” Troutman Pepper Consumer Financial Services Law Monitor, July 7, 2020.
- Co-author, “FTC Settles With App Developer Over Allegations of Unlawfully Processing Children’s Information,” Troutman Pepper Consumer Financial Services Law Monitor, June 9, 2020.
- Co-author, “CISA Shares 5 Ways Business Leaders Could Reduce Their Organizations’ Cyber Risks,” Troutman Pepper Consumer Financial Services Law Monitor, June 8, 2020.
- Co-author, “FTC Settles With Online Game Developer Regarding Allegations Concerning Children’s Privacy,” Troutman Pepper Consumer Financial Services Law Monitor, May 21, 2020.
- Co-author, “Calif. Privacy Law Takeaways From 9th Circ. Facebook Case,” *Law360*, April 27, 2020.
- Co-author, “Calif. AG’s Latest Privacy Law Revisions Miss Some Spots,” *Law360*, March 19, 2020.
- Co-author, “FTC Will Accept Additional Comments on Proposed Amendments to the Safeguards Rule,” Troutman Pepper Consumer Financial Services Law Monitor, March 16, 2020.