

Mapping Privacy Requirements

This guide addresses the privacy requirements of the General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), the [California Privacy Rights Act](#) (CPRA), Virginia’s [Consumer Data Protection Act](#) (CDPA), Colorado’s [Colorado Privacy Act](#) (CPA), Utah’s [Consumer Privacy Act](#) (UCPA), Connecticut’s [Data Privacy Act](#) (CTDPA), Iowa’s [Consumer Data Protection Act](#) (IO-CDPA), Indiana’s [Consumer Data Protection Act](#) (IN-CDPA), Tennessee’s [Information Protection Act](#) (TIPA), and Montana’s [Consumer Data Privacy Act](#) (MCDPA). State privacy laws are increasingly mapping to the GDPR, requiring privacy assessments and imposing principles of data minimization, purpose limitation, and storage limitation. However, U.S. laws don’t require a “lawful” basis for processing personal information. Instead, each law gives consumers a number of GDPR-like rights (most often, access, deletion, and correction) and allows consumers to opt-out of certain processing activities focused on targeting advertising, profiling, and personal data sharing. Only Virginia, Colorado, and Connecticut require an opt-in for the processing of sensitive personal information. While building a privacy program across a patchwork of laws can be a challenge, there are some key similarities between the laws that can be used to create a uniform approach. Companies should focus on: 1) understanding the internal data collection practices, governance, and storage structure (what do you collect, where does it sit, how do you use it, and who do you share it with); 2) understanding vendor and business partner obligations; 3) planning to provide data subject rights; 4) documenting your program, including any risk assessment; and 5) documenting your cybersecurity program.

[Contents](#)

[EFFECTIVE DATES](#)

[SCOPE](#)

[OPT-IN/OPT-OUT REQUIREMENTS](#)

[OTHER CONSUMER RIGHTS](#)

[BUSINESS OBLIGATIONS](#)

[PROCESSOR OBLIGATIONS](#)

[LIABILITY/ENFORCEMENT](#)

[DEFINITIONS](#)

EFFECTIVE DATES

	GDPR (EU)	CCPA (CALIFORNIA)	CPRA (CALIFORNIA)	CDPA (VIRGINIA)	CPA (COLORADO)	UCPA (UTAH)	CTDPA (CONNECTICUT)	IO-CDPA (IOWA)	IN-CDPA (INDIANA)	TIPA (TENNESSEE)	MCDPA (MONTANA)
EFFECTIVE DATE	May 25, 2018	January 1, 2020 *Regulations effective August 14, 2020.	January, 1, 2023 *With the exception of the right of access, the CPRA only applies to personal information collected by a business on or after January 1, 2022.	January 1, 2023	July 1, 2023 *Universal opt-out requirements will not go into effect until July 1, 2024.	December 31, 2023	July 1, 2023 *Universal opt-out requirements will not go into effect until January 1, 2025.	January 1, 2025	January 1, 2026	July 1, 2025	October 1, 2024
ENFORCEMENT DATE	May 25, 2018	July 1, 2020	July 1, 2023 *Enforcement applies to violations that take place after this date.	January 1, 2023	July 1, 2023	December 31, 2023	July 1, 2023	January 1, 2025	January 1, 2026	July 1, 2025	October 1, 2024
IMPLEMENTING REGULATION	N/A Certain member states have implemented member-state specific legislation.	Regulations effective August 14, 2020.	CRPA regulations became effective on March 29, 2023. Another set of CPRA regulations is forthcoming relating to automated decision-making, cybersecurity audits and risk assessments.	A working group of government, business, and privacy representatives reviewed issues related to implementation and published its final report (which contains findings, best practices, and recommendations) on November 1, 2021.	CPA regulations are now final and will go into effect July 1, 2023. Opinion letters and interpretive guidance on what constitutes a violation of the Act will be issued on January 1, 2025, and establish technical specifications for valid user-enabled universal opt out mechanisms by July 1, 2023.	The UCPA does not provide explicit authority for the Attorney General to issue regulations.	The CTDPA does not provide explicit authority for the Attorney General to issue regulations.	The IO-CDPA does not provide explicit authority for the Attorney General to issue regulations.	The IN-CPDA does not provide explicit authority for the Attorney General to issue regulations.	The TIPA does not provide explicit authority for the Attorney General to issue regulations.	The MCDPA does not provide explicit authority for the Attorney General to issue regulations.

SCOPE

	<u>GDPR</u> <u>(EU)</u>	<u>CCPA</u> <u>(CALIFORNIA)</u>	<u>CPRA</u> <u>(CALIFORNIA)</u>	<u>CDPA</u> <u>(VIRGINIA)</u>	<u>CPA</u> <u>(COLORADO)</u>	<u>UCPA</u> <u>(UTAH)</u>	<u>CTDPA</u> <u>(CONNECTICUT)</u>	<u>IO-CDPA</u> <u>(IOWA)</u>	<u>IN-CDPA</u> <u>(INDIANA)</u>	<u>TIPA</u> <u>(TENNESSEE)</u>	<u>MCDPA</u> <u>(MONTANA)</u>
THRESHOLDS	<ul style="list-style-type: none">Applies to the automated processing of personal data or processing that is part of a filing system.Applies to data collected from individuals in the EU.Applies to companies with an establishment in the EU or companies that sell services or products in the EU or that target or monitor individuals in the EU.	Applies to companies that do business in California and: <ul style="list-style-type: none">Have annual gross revenues over twenty-five million dollars (\$25,000,000).Alone or in combination, annually buys, receives for the business’s commercial purposes, sells, or shares for commercial purposes, alone or in combination, the personal information of 50,000 or more consumers, households, or devices.Derives 50 percent or more of its annual revenues from selling consumers’ personal information.	Applies to companies that do business in California and: <ul style="list-style-type: none">As of January 1st of the preceding year, had annual gross revenues over twenty-five million dollars (\$25,000,000) in the preceding year.Alone or in combination, annually buys, sells, or shares the personal information of 100,000 or more consumers or households.Derives 50 percent or more of its annual revenues from selling or sharing consumers’ personal information.	Applies to businesses that: <ul style="list-style-type: none">Conduct business in the Commonwealth or produce products or services that are targeted to residents of the Commonwealth, ANDProcess or control data of at least 100,000 consumers, ORProcess or control data of at least 25,000 consumers, and derive over 50% of gross revenue from selling personal data.	Applies to controllers who: <ul style="list-style-type: none">Conduct business or produce commercial products or services that are intentionally targeted to Colorado residents, ANDControl or process personal data of more than 100,000 consumers per calendar year; ORDerive revenue from the sale of personal data and control or process the personal data of at least 25,000 consumers.	Applies to controllers and processors who: <ul style="list-style-type: none">Conduct business in the state; or produce a product or service that is targeted to consumers who are residents of the state; ANDHas annual revenue of twenty-five million dollars (\$25,000,000) or more; ANDSatisfies one of the following thresholds:<ol style="list-style-type: none">During a calendar year, controls or processes personal data of 100,000 or more consumers; ORDerives 50% of the entity’s gross revenue from the sale of personal data <u>and controls or processes personal data of 25,000</u> or more consumers.	Applies to persons who: <ul style="list-style-type: none">Conduct business in the state; or produce products or services that are targeted to residents of this state and that during the preceding calendar year:<ol style="list-style-type: none">Controlled or processed the personal data of not less than 100,000 consumers, excluding personal data controlled or processed solely for the purpose of completing a payment transaction; ORControlled or processed the personal data of not less than 25,000 consumers and derived more than 25% of their gross revenue from the sale of personal data.	Applies to persons who: <ul style="list-style-type: none">Conduct business in the state; or produce products or services that are targeted to residents of this state and that during a calendar year:<ol style="list-style-type: none">Controls or processes the personal data of at least 100,000 consumers; ORControls or processes the personal data of at least 25,000 consumers and derives more than 50% of their gross revenue from the sale of personal data.	Applies to persons who: <ul style="list-style-type: none">Conduct business in the state; or produce products or services that are targeted to residents of this state and that during a calendar year:<ol style="list-style-type: none">Controls or processes the personal data of at least 100,000 consumers; ORControls or processes the personal data of at least 25,000 consumers and derives more than 50% of their gross revenue from the sale of personal information; ORDuring a calendar year, controls or processes the personal information of at least 175,000 consumers.	Applies to persons who: <ul style="list-style-type: none">Conduct business in the state; or produce products or services that are targeted to residents of this state and that:<ol style="list-style-type: none">Exceeds \$25,000,000 in revenue; ANDControls or processes the personal data of at least 25,000 consumers and derives more than 50% of their gross revenue from the sale of personal information; OR	Applies to persons who: <ul style="list-style-type: none">Conduct business in the state; or produce products or services that are targeted to residents of this state; AND<ol style="list-style-type: none">Controls or processes the personal data of at least 50,000 consumers; ORControls or processes the personal data of at least 25,000 consumers and derives more than 25% of their gross revenue from the sale of personal data.
EXEMPT BUSINESS	<ul style="list-style-type: none">Activities that fall outside the scope of Union lawActivities of a natural person in the course of a purely personal or household activityActivities of the competent authorities for the prevention, investigation, detection or prosecution of criminal offenses.	<input checked="" type="checkbox"/> HEALTHCARE PROVIDERS <input type="checkbox"/> GLBA COVERED ENTITIES <input checked="" type="checkbox"/> NON-PROFITS <input checked="" type="checkbox"/> HIGHER EDUCATION INSTITUTION	<input checked="" type="checkbox"/> HEALTHCARE PROVIDERS <input type="checkbox"/> GLBA COVERED ENTITIES <input checked="" type="checkbox"/> NON-PROFITS* <input type="checkbox"/> HIGHER EDUCATION INSTITUTION	<input checked="" type="checkbox"/> HIPAA COVERED ENTITIES <input checked="" type="checkbox"/> GLBA COVERED ENTITIES <input checked="" type="checkbox"/> NON-PROFITS <input checked="" type="checkbox"/> HIGHER EDUCATION* INSTITUTION	<input type="checkbox"/> HIPAA COVERED ENTITIES <input checked="" type="checkbox"/> GLBA COVERED ENTITIES <input type="checkbox"/> NON-PROFITS <input checked="" type="checkbox"/> HIGHER EDUCATION INSTITUTION <input checked="" type="checkbox"/> AIR CARRIERS	<input checked="" type="checkbox"/> HIPAA COVERED ENTITIES <input checked="" type="checkbox"/> GLBA COVERED ENTITIES <input checked="" type="checkbox"/> NON-PROFITS* <input checked="" type="checkbox"/> HIGHER EDUCATION INSTITUTION <input checked="" type="checkbox"/> AIR CARRIERS	<input checked="" type="checkbox"/> HIPAA COVERED ENTITIES <input checked="" type="checkbox"/> GLBA COVERED ENTITIES <input checked="" type="checkbox"/> NON-PROFITS* <input checked="" type="checkbox"/> HIGHER EDUCATION INSTITUTION	<input checked="" type="checkbox"/> HIPAA COVERED ENTITIES <input checked="" type="checkbox"/> GLBA COVERED ENTITIES <input checked="" type="checkbox"/> NON-PROFITS <input checked="" type="checkbox"/> HIGHER EDUCATION INSTITUTION	<input checked="" type="checkbox"/> HIPAA COVERED ENTITIES <input checked="" type="checkbox"/> GLBA COVERED ENTITIES <input checked="" type="checkbox"/> NON-PROFITS <input checked="" type="checkbox"/> HIGHER EDUCATION INSTITUTION	<input checked="" type="checkbox"/> HIPAA COVERED ENTITIES <input checked="" type="checkbox"/> GLBA COVERED ENTITIES <input checked="" type="checkbox"/> NON-PROFITS <input checked="" type="checkbox"/> HIGHER EDUCATION INSTITUTION	<input checked="" type="checkbox"/> HIPAA COVERED ENTITIES <input checked="" type="checkbox"/> GLBA COVERED ENTITIES <input checked="" type="checkbox"/> NON-PROFITS <input checked="" type="checkbox"/> HIGHER EDUCATION INSTITUTION <input checked="" type="checkbox"/> AIR CARRIERS

EXEMPT DATA	N/A	<input checked="" type="checkbox"/> HIPAA COVERED DATA <input checked="" type="checkbox"/> DE-IDENTIFIED DATA <input checked="" type="checkbox"/> CLINICAL TRIAL DATA <input checked="" type="checkbox"/> FCRA DATA <input checked="" type="checkbox"/> GLBA COVERED DATA <input checked="" type="checkbox"/> DPPA COVERED DATA <input checked="" type="checkbox"/> FERPA COVERED DATA* (only exempt from deletion/access) <input type="checkbox"/> COPPA COVERED DATA	<input checked="" type="checkbox"/> HIPAA COVERED DATA <input checked="" type="checkbox"/> DE-IDENTIFIED DATA <input checked="" type="checkbox"/> CLINICAL TRIAL DATA <input checked="" type="checkbox"/> FCRA DATA <input checked="" type="checkbox"/> GLBA COVERED DATA <input checked="" type="checkbox"/> DPPA COVERED DATA <input checked="" type="checkbox"/> FERPA COVERED DATA * (only exempt from deletion/access) <input type="checkbox"/> COPPA COVERED DATA	<input checked="" type="checkbox"/> HIPAA COVERED DATA <input checked="" type="checkbox"/> DE-IDENTIFIED DATA <input checked="" type="checkbox"/> CLINICAL TRIAL DATA <input checked="" type="checkbox"/> FCRA DATA <input checked="" type="checkbox"/> GLBA COVERED DATA <input checked="" type="checkbox"/> DPPA COVERED DATA <input checked="" type="checkbox"/> FERPA COVERED DATA <input checked="" type="checkbox"/> COPPA COVERED DATA* (consent obligations)	<input checked="" type="checkbox"/> HIPAA COVERED DATA <input checked="" type="checkbox"/> DE-IDENTIFIED DATA <input checked="" type="checkbox"/> CLINICAL TRIAL DATA <input checked="" type="checkbox"/> FCRA DATA <input checked="" type="checkbox"/> GLBA COVERED DATA <input checked="" type="checkbox"/> DPPA COVERED DATA <input checked="" type="checkbox"/> FERPA COVERED DATA <input checked="" type="checkbox"/> COPPA COVERED DATA	<input checked="" type="checkbox"/> HIPAA COVERED DATA <input checked="" type="checkbox"/> DE-IDENTIFIED DATA <input checked="" type="checkbox"/> CLINICAL TRIAL DATA <input checked="" type="checkbox"/> FCRA DATA <input checked="" type="checkbox"/> GLBA COVERED DATA <input checked="" type="checkbox"/> DPPA COVERED DATA <input checked="" type="checkbox"/> FERPA COVERED DATA <input checked="" type="checkbox"/> COPPA COVERED DATA* (consent obligations)	<input checked="" type="checkbox"/> HIPAA COVERED DATA <input checked="" type="checkbox"/> DE-IDENTIFIED DATA <input checked="" type="checkbox"/> CLINICAL TRIAL DATA <input checked="" type="checkbox"/> FCRA DATA <input checked="" type="checkbox"/> GLBA COVERED DATA <input checked="" type="checkbox"/> DPPA COVERED DATA <input checked="" type="checkbox"/> FERPA COVERED DATA <input checked="" type="checkbox"/> COPPA COVERED DATA* (consent obligations)	<input checked="" type="checkbox"/> HIPAA COVERED DATA <input checked="" type="checkbox"/> DE-IDENTIFIED DATA <input checked="" type="checkbox"/> CLINICAL TRIAL DATA <input checked="" type="checkbox"/> FCRA DATA <input checked="" type="checkbox"/> GLBA COVERED DATA <input checked="" type="checkbox"/> DPPA COVERED DATA <input checked="" type="checkbox"/> FERPA COVERED DATA <input checked="" type="checkbox"/> COPPA COVERED DATA	<input checked="" type="checkbox"/> HIPAA COVERED DATA <input checked="" type="checkbox"/> DE-IDENTIFIED DATA <input checked="" type="checkbox"/> CLINICAL TRIAL DATA <input checked="" type="checkbox"/> FCRA DATA <input checked="" type="checkbox"/> GLBA COVERED DATA <input checked="" type="checkbox"/> DPPA COVERED DATA <input checked="" type="checkbox"/> FERPA COVERED DATA <input checked="" type="checkbox"/> COPPA COVERED DATA* (consent obligations)	<input checked="" type="checkbox"/> HIPAA COVERED DATA <input checked="" type="checkbox"/> DE-IDENTIFIED DATA <input checked="" type="checkbox"/> CLINICAL TRIAL DATA <input checked="" type="checkbox"/> FCRA DATA <input checked="" type="checkbox"/> GLBA COVERED DATA <input checked="" type="checkbox"/> DPPA COVERED DATA <input checked="" type="checkbox"/> FERPA COVERED DATA <input checked="" type="checkbox"/> COPPA COVERED DATA* (consent obligations)	<input checked="" type="checkbox"/> HIPAA COVERED DATA <input checked="" type="checkbox"/> DE-IDENTIFIED DATA <input checked="" type="checkbox"/> CLINICAL TRIAL DATA <input checked="" type="checkbox"/> FCRA DATA <input checked="" type="checkbox"/> GLBA COVERED DATA <input checked="" type="checkbox"/> DPPA COVERED DATA <input checked="" type="checkbox"/> FERPA COVERED DATA <input checked="" type="checkbox"/> COPPA COVERED DATA* (consent obligations)
EMPLOYEE DATA EXEMPTION	NO	YES	NO	YES	YES	YES	YES	YES	YES	YES	YES
B2B EXEMPTION	NO	YES	NO	YES	YES	YES	YES	YES	YES	YES	YES
EXEMPTION FOR PSEUDONYMOUS DATA	NO	NO	NO	YES*	YES*	YES*	YES*	YES*	YES*	YES*	YES*
				*Consumer rights, <u>except for opt out of sale, target advertising, and profiling</u> , will not apply to pseudonymous data as long as: (1) pseudonymous data is kept separately and (2) subject to appropriate technical and organizational controls.	*Consumer rights, <u>except for opt out of sale, target advertising, and profiling</u> , will not apply to pseudonymous data as long as: (1) pseudonymous data is kept separately and (2) subject to appropriate technical and organizational controls.	*Consumer rights, <u>except for opt out of sale, target advertising, and profiling</u> , will not apply to pseudonymous data as long as: (1) pseudonymous data is kept separately and (2) subject to appropriate technical and organizational controls.	*Consumer rights, <u>except for opt out of sale, target advertising, and profiling</u> , will not apply to pseudonymous data as long as: (1) pseudonymous data is kept separately and (2) subject to appropriate technical and organizational controls.	*Consumer rights, <u>except for opt out of sale and target advertising</u> , will not apply to pseudonymous data as long as: (1) pseudonymous data is kept separately and (2) subject to appropriate technical and organizational controls.	*Consumer rights, <u>except for opt out of sale, target advertising, and profiling</u> , will not apply to pseudonymous data as long as: (1) pseudonymous data is kept separately and (2) subject to appropriate technical and organizational controls.	*Consumer rights will not apply to pseudonymous data as long as: (1) pseudonymous data is kept separately and (2) subject to appropriate technical and organizational controls.	*Consumer rights, <u>except for opt out of sale, target advertising, and profiling</u> , will not apply to pseudonymous data as long as: (1) pseudonymous data is kept separately and (2) subject to appropriate technical and organizational controls.
EXEMPTION FOR AGGREGATE DATA	YES	YES	YES	YES	YES	YES	NOT EXPLICIT	YES	YES	YES	NOT EXPLICIT
EXEMPTION FOR DE-IDENTIFIED DATA	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES

OPT-IN/OPT-OUT REQUIREMENTS

	<u>GDPR</u> <u>(EU)</u>	<u>CCPA</u> <u>(CALIFORNIA)</u>	<u>CPRA</u> <u>(CALIFORNIA)</u>	<u>CDPA</u> <u>(VIRGINIA)</u>	<u>CPA</u> <u>(COLORADO)</u>	<u>UCPA</u> <u>(UTAH)</u>	<u>CTDPA</u> <u>(CONNECTICUT)</u>	<u>IO-CDPA</u> <u>(IOWA)</u>	<u>IN-CDPA</u> <u>(INDIANA)</u>	<u>TIPA</u> <u>(TENNESSEE)</u>	<u>MCDPA</u> <u>(MONTANA)</u>
OPT-OUT OF SALE	N/A* *General right to object to processing/withdraw consent.	YES	YES	YES *Sale only includes exchanges for money	YES	YES* *Sale only includes exchanges for money	YES	YES* *Sale only includes exchanges for money	YES* *Sale only includes exchanges for money	YES* *Sale only includes exchanges for money	YES
OPT-OUT OF TARGETED ADVERTISING / INTEREST-BASED ADVERTISING	N/A* *General right to object to processing/withdraw consent.	NO* *Only when these activities fall into the definition of “sale”	YES	YES	YES	YES	YES	YES	YES	YES	YES
OPT-OUT OF AUTOMATED DECISION-MAKING / PROFILING WITH SIGNIFICANT OR LEGAL EFFECTS	YES	NO	YES	YES	YES	NO	YES	NO	YES	YES	YES
OPT-OUT/OPT-IN TO SENSITIVE PERSONAL INFORMATION	OPT-IN	N/A	OPT-OUT	OPT-IN	OPT-IN	OPT-OUT	OPT-IN	OPT-OUT	OPT-IN	OPT-IN	OPT-IN
OPT-IN REQUIRED TO SALE/SHARE (FOR TARGETED ADVERTISING) MINOR’S PERSONAL INFORMATION (AGES 13-15)	N/A	YES* *For the sale of personal information of minors.	YES* *For the sale/sharing of personal information of minors 13-15.	NO	NO	NO	YES* *For the sale/targeted advertising using personal data of minors 13 to 15.	NO	NO	NO	YES* *For the sale of targeted advertising using personal data of between 13 to 15.
REQUIREMENT TO HONOR OPT-OUT PREFERENCE SIGNALS	N/A	NO	YES	NO	YES* *Effective July 1, 2024.	NO	YES* *Effective January 1, 2025.	NO	NO	NO	YES* *Effective January 1, 2025.

OTHER CONSUMER RIGHTS

	<u>GDPR</u> <u>(EU)</u>	<u>CCPA</u> <u>(CALIFORNIA)</u>	<u>CPRA</u> <u>(CALIFORNIA)</u>	<u>CDPA</u> <u>(VIRGINIA)</u>	<u>CPA</u> <u>(COLORADO)</u>	<u>UCPA</u> <u>(UTAH)</u>	<u>CTDPA</u> <u>(CONNECTICUT)</u>	<u>IO-CDPA</u> <u>(IOWA)</u>	<u>IN-CDPA</u> <u>(INDIANA)</u>	<u>TIPA</u> <u>(TENNESSEE)</u>	<u>MCDPA</u> <u>(MONTANA)</u>
RIGHT TO CONFIRM PROCESSING	YES	YES *Right to know if data is sold.	YES *Right to know if data is sold or shared.	YES	YES	YES	YES	YES	YES	YES	YES
RIGHT TO ACCESS TO PERSONAL INFORMATION	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
RIGHT TO CORRECT INACCURACIES	YES	NO	YES	YES	YES	NO	YES	NO	YES	YES	YES
RIGHT TO PORTABILITY	YES	YES *Where technically feasible.	YES *Where technically feasible.	YES *Where technically feasible.	YES *Where technically feasible.	YES *Where technically feasible.	YES *Where technically feasible.	YES *Where technically feasible.	YES *Where technically feasible.	YES *Where technically feasible.	YES *Where technically feasible
RIGHT TO DELETE/ERASE	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
CONSUMER APPEALS PROCESS REQUIRED (If the controller decides not to take action on a consumer request.)	N/A	NO	NO	YES	YES	NO	YES	YES	YES	YES	YES

BUSINESS OBLIGATIONS

	<u>GDPR</u> (EU)	<u>CCPA</u> (CALIFORNIA)	<u>CPRA</u> (CALIFORNIA)	<u>CDPA</u> (VIRGINIA)	<u>CPA</u> (COLORADO)	<u>UCPA</u> (UTAH)	<u>CTDPA</u> (CONNECTICUT)	<u>IO-CDPA</u> (IOWA)	<u>IN-CDPA</u> (INDIANA)	<u>TIPA</u> (TENNESSEE)	<u>MCDPA</u> (MONTANA)
TIME TO REPLY TO RIGHTS REQUEST	1 MONTH + 2 MONTH EXTENSION (when necessary) (90 Days)	45 DAYS + 45 DAY EXTENSION (for requests to know/delete) (90 Days) 15 DAYS (for opt-out of sale)	45 DAYS + 45 DAY EXTENSION (for requests to know/delete/correct) (90 Days) 15 DAYS (for opt-out of sale/sharing)	45 DAYS + 45 DAY EXTENSION (90 Days)	45 DAYS + 45 DAY EXTENSION (90 days)	45 DAYS + 45 DAY EXTENSION (90 days)	45 DAYS + 45 DAY EXTENSION (90 days) 15 DAYS (to cease processing if consumer revokes consent)	90 DAYS + 45 DAY EXTENSION (135 days)	45 DAYS + 45 DAY EXTENSION (90 days)	45 DAYS + 45 DAY EXTENSION (90 days)	45 DAYS + 45 DAY EXTENSION (90 days)
REQUIREMENT TO AUTHENTICATE/VERIFY CONSUMER REQUEST	YES	YES* *For opt-out of sale requests, businesses must honor the request without authentication.	YES* *For opt-out of sale/sharing requests, businesses must honor the request without authentication.	YES	YES	YES	YES* *For opt-out of sale, sharing, and profiling requests, businesses must honor the request without authentication.	YES	YES	YES	YES* *Authentication may not be required for opt out requests.
REQUIRED TO PRACTICE DATA MINIMIZATION	YES	NO	YES	YES	YES	NO	YES	YES	YES	YES	YES
REQUIRED TO PRACTICE PURPOSE LIMITATION	YES	NO	YES	YES	YES	NO	YES	YES	YES	YES	YES
REQUIRED TO PROVIDE ADMINISTRATIVE, TECHNICAL AND PHYSICAL SECURITY CONTROLS	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
RESTRICTIONS ON DISCRIMINATION <i>(Cannot deny goods or services, charge different prices or rates for goods or services, or provide a different level of quality of goods and services to the consumer that exercises their rights).</i>	YES (Not explicitly addressed, but not permitted.)	YES (Allows for different prices/levels of service related to the value of the data to the business.) *Financial incentive disclosures are required.	YES (Does not prohibit loyalty, rewards, premium features, discounts, or club card programs.) *Businesses may only enter a consumer into a financial incentive program if the consumer gives the business prior opt-in consent, which may be revoked at any time. Financial incentive disclosures are required.	YES (Does not prohibit loyalty, rewards, premium features, discounts, or club card programs.) *Financial incentive disclosures are not expressly required.	YES (Does not prohibit loyalty, rewards, premium features, discounts, or club card programs.) *Controllers must notify the consumer if their decision to exercise a data right impacts the consumer’s membership in a loyalty program, and must provide the consumer with a reference/link to certain loyalty program disclosures before discontinuing the consumer’s benefit or membership.	YES (Does not prohibit loyalty, rewards, premium features, discounts, or club card programs.) *Financial incentive disclosures are not expressly required.	YES (Does not prohibit loyalty, rewards, premium features, discounts, or club card programs.) *Controllers must present the terms of any financial incentive offered for the retention, use, sale or sharing of a consumer’s personal data if the controller responds to an opt out of sale or targeted advertising request by informing the consumer of a charge for the use of any product or service.	YES (Does not prohibit loyalty, rewards, premium features, discounts, or club card programs.) *Financial incentive disclosures are not expressly required.	YES (Does not prohibit loyalty, rewards, premium features, discounts, or club card programs.) *Financial incentive disclosures are not expressly required.	YES (Does not prohibit loyalty, rewards, premium features, discounts, or club card programs.) *Financial incentive disclosures are not expressly required.	YES (Does not prohibit loyalty, rewards, premium features, discounts, or club card programs.) *Controllers must present the terms of any financial incentive offered for the retention, use, sale or sharing of a consumer’s personal data if the controller responds to an opt out of sale or targeted advertising request by informing the consumer of a charge for the use of any product or service.

	<u>GDPR</u> (EU)	<u>CCPA</u> (CALIFORNIA)	<u>CPRA</u> (CALIFORNIA)	<u>CDPA</u> (VIRGINIA)	<u>CPA</u> (COLORADO)	<u>UCPA</u> (UTAH)	<u>CTDPA</u> (CONNECTICUT)	<u>IO-CDPA</u> (IOWA)	<u>IN-CDPA</u> (INDIANA)	<u>TIPA</u> (TENNESSEE)	<u>MCDPA</u> (MONTANA)
DPIAS REQUIRED?	YES *High-risk activities.	NO	YES *Cybersecurity assessments	YES *High-risk activities	YES *High-risk activities	NO	YES *High-risk activities	NO	YES *High-risk activities	YES *High-risk activities	YES *High-risk activities *Applies to processing activities created or generated after January 1, 2025 (not retroactive).

PROCESSOR OBLIGATIONS

	<u>GDPR</u> (EU)	<u>CCPA</u> (CALIFORNIA)	<u>CPRA</u> (CALIFORNIA)	<u>CDPA</u> (VIRGINIA)	<u>CPA</u> (COLORADO)	<u>UCPA</u> (UTAH)	<u>CTDPA</u> (CONNECTICUT)	<u>IO-CDPA</u> (IOWA)	<u>IN-CDPA</u> (INDIANA)	<u>TIPA</u> (TENNESSEE)	<u>MCDPA</u> (MONTANA)
CONTRACT REQUIREMENTS	<input checked="" type="checkbox"/> CONTRACT REQUIRED <input checked="" type="checkbox"/> LIMITATIONS ON DATA USE <input checked="" type="checkbox"/> IMPOSE A DUTY CONFIDENTIALITY OF EMPLOYEES <input checked="" type="checkbox"/> AUDIT REQUIREMENT <input checked="" type="checkbox"/> ASSIST WITH CONTROLLER OBLIGATIONS <input checked="" type="checkbox"/> APPROVAL OF SUBCONTRACTORS <input checked="" type="checkbox"/> DELETE OR RETURN ALL DATA AT THE END OF THE SERVICES <input type="checkbox"/> NOTIFY THE CONTROLLER IF OBLIGATIONS CAN NO LONGER BE MET	<input checked="" type="checkbox"/> CONTRACT REQUIRED <input checked="" type="checkbox"/> LIMITATIONS ON DATA USE <input type="checkbox"/> IMPOSE A DUTY CONFIDENTIALITY OF EMPLOYEES <input type="checkbox"/> AUDIT REQUIREMENT <input checked="" type="checkbox"/> ASSIST WITH CONTROLLER OBLIGATIONS <input type="checkbox"/> APPROVAL OF SUBCONTRACTORS <input type="checkbox"/> DELETE OR RETURN ALL DATA <input type="checkbox"/> NOTIFY THE CONTROLLER IF OBLIGATIONS CAN NO LONGER BE MET	<input checked="" type="checkbox"/> CONTRACT REQUIRED <input checked="" type="checkbox"/> LIMITATIONS ON DATA USE <input type="checkbox"/> IMPOSE A DUTY OF CONFIDENTIALITY ON EMPLOYEES <input checked="" type="checkbox"/> AUDIT REQUIREMENT <input checked="" type="checkbox"/> ASSIST WITH CONTROLLER OBLIGATIONS <input type="checkbox"/> APPROVAL OF SUBCONTRACTORS <input checked="" type="checkbox"/> DELETE OR RETURN ALL DATA <input checked="" type="checkbox"/> NOTIFY THE CONTROLLER IF OBLIGATIONS CAN NO LONGER BE ME	<input checked="" type="checkbox"/> CONTRACT REQUIRED <input checked="" type="checkbox"/> LIMITATIONS ON DATA USE <input checked="" type="checkbox"/> IMPOSE A DUTY CONFIDENTIALITY OF EMPLOYEES <input checked="" type="checkbox"/> AUDIT REQUIREMENT <input checked="" type="checkbox"/> ASSIST WITH CONTROLLER OBLIGATIONS <input type="checkbox"/> APPROVAL OF SUBCONTRACTORS <input checked="" type="checkbox"/> DELETE OR RETURN ALL DATA <input checked="" type="checkbox"/> NOTIFY THE CONTROLLER IF OBLIGATIONS CAN NO LONGER BE MET	<input checked="" type="checkbox"/> CONTRACT REQUIRED <input checked="" type="checkbox"/> LIMITATIONS ON DATA USE <input checked="" type="checkbox"/> IMPOSE A DUTY CONFIDENTIALITY OF EMPLOYEES <input checked="" type="checkbox"/> AUDIT REQUIREMENT <input checked="" type="checkbox"/> ASSIST WITH CONTROLLER OBLIGATIONS <input checked="" type="checkbox"/> APPROVAL OF SUBCONTRACTORS <input checked="" type="checkbox"/> DELETE OR RETURN ALL DATA <input type="checkbox"/> NOTIFY THE CONTROLLER IF OBLIGATIONS CAN NO LONGER BE MET	<input checked="" type="checkbox"/> CONTRACT REQUIRED <input checked="" type="checkbox"/> LIMITATIONS ON DATA USE <input checked="" type="checkbox"/> IMPOSE A DUTY CONFIDENTIALITY OF EMPLOYEES <input type="checkbox"/> AUDIT REQUIREMENT <input checked="" type="checkbox"/> ASSIST WITH CONTROLLER OBLIGATIONS <input type="checkbox"/> APPROVAL OF SUBCONTRACTORS <input type="checkbox"/> DELETE OR RETURN ALL DATA <input type="checkbox"/> NOTIFY THE CONTROLLER IF OBLIGATIONS CAN NO LONGER BE MET	<input checked="" type="checkbox"/> CONTRACT REQUIRED <input checked="" type="checkbox"/> LIMITATIONS ON DATA USE <input checked="" type="checkbox"/> IMPOSE A DUTY CONFIDENTIALITY OF EMPLOYEES <input checked="" type="checkbox"/> AUDIT REQUIREMENT <input checked="" type="checkbox"/> ASSIST WITH CONTROLLER OBLIGATIONS <input checked="" type="checkbox"/> APPROVAL OF SUBCONTRACTORS <input checked="" type="checkbox"/> DELETE OR RETURN ALL DATA <input type="checkbox"/> NOTIFY THE CONTROLLER IF OBLIGATIONS CAN NO LONGER BE MET	<input checked="" type="checkbox"/> CONTRACT REQUIRED <input checked="" type="checkbox"/> LIMITATIONS ON DATA USE <input checked="" type="checkbox"/> IMPOSE A DUTY CONFIDENTIALITY OF EMPLOYEES <input checked="" type="checkbox"/> AUDIT REQUIREMENT <input checked="" type="checkbox"/> ASSIST WITH CONTROLLER OBLIGATIONS <input type="checkbox"/> APPROVAL OF SUBCONTRACTORS <input checked="" type="checkbox"/> DELETE OR RETURN ALL DATA <input type="checkbox"/> NOTIFY THE CONTROLLER IF OBLIGATIONS CAN NO LONGER BE MET	<input checked="" type="checkbox"/> CONTRACT REQUIRED <input checked="" type="checkbox"/> LIMITATIONS ON DATA USE <input checked="" type="checkbox"/> IMPOSE A DUTY CONFIDENTIALITY OF EMPLOYEES <input checked="" type="checkbox"/> AUDIT REQUIREMENT <input checked="" type="checkbox"/> ASSIST WITH CONTROLLER OBLIGATIONS <input type="checkbox"/> APPROVAL OF SUBCONTRACTORS <input checked="" type="checkbox"/> DELETE OR RETURN ALL DATA <input type="checkbox"/> NOTIFY THE CONTROLLER IF OBLIGATIONS CAN NO LONGER BE MET	<input checked="" type="checkbox"/> CONTRACT REQUIRED <input checked="" type="checkbox"/> LIMITATIONS ON DATA USE <input checked="" type="checkbox"/> IMPOSE A DUTY CONFIDENTIALITY OF EMPLOYEES <input checked="" type="checkbox"/> AUDIT REQUIREMENT <input checked="" type="checkbox"/> ASSIST WITH CONTROLLER OBLIGATIONS <input type="checkbox"/> APPROVAL OF SUBCONTRACTORS <input checked="" type="checkbox"/> DELETE OR RETURN ALL DATA <input type="checkbox"/> NOTIFY THE CONTROLLER IF OBLIGATIONS CAN NO LONGER BE MET	<input checked="" type="checkbox"/> CONTRACT REQUIRED <input checked="" type="checkbox"/> LIMITATIONS ON DATA USE <input checked="" type="checkbox"/> IMPOSE A DUTY CONFIDENTIALITY OF EMPLOYEES <input checked="" type="checkbox"/> AUDIT REQUIREMENT <input checked="" type="checkbox"/> ASSIST WITH CONTROLLER OBLIGATIONS <input type="checkbox"/> APPROVAL OF SUBCONTRACTORS <input checked="" type="checkbox"/> DELETE OR RETURN ALL DATA <input type="checkbox"/> NOTIFY THE CONTROLLER IF OBLIGATIONS CAN NO LONGER BE MET

LIABILITY/ENFORCEMENT

	<u>GDPR</u> <u>(EU)</u>	<u>CCPA</u> <u>(CALIFORNIA)</u>	<u>CPRA</u> <u>(CALIFORNIA)</u>	<u>CDPA</u> <u>(VIRGINIA)</u>	<u>CPA</u> <u>(COLORADO)</u>	<u>UCPA</u> <u>(UTAH)</u>	<u>CTDPA</u> <u>(CONNECTICUT)</u>	<u>IO-CDPA</u> <u>(IOWA)</u>	<u>IN-CDPA</u> <u>(INDIANA)</u>	<u>TIPA</u> <u>(TENNESSEE)</u>	<u>MCDPA</u> <u>(MONTANA)</u>
CURE PERIOD	NO	YES 30 Days	NO	YES 30 Days	YES 60 days until provision expires on Jan. 1, 2025	YES 30 Days	YES 60 days until provision expires on Jan. 1, 2025	YES 90 Days	YES 30 Days	YES 60 Days	YES 60 Days until provision expires on April 1, 2026.
ENFORCING AGENCY	Member state data protection authority (“DPA”)	Office of California’s Attorney General’s Office	California Privacy Protection Agency (“CPPA”) *Governed by a five-person board and a Chief Privacy Auditor to conduct audits of businesses.	Virginia Attorney General	Colorado Attorney General	Utah Attorney General *Division of Consumer Protection may accept and investigate complaints regarding the processing of personal data.	Connecticut Attorney General	Iowa Attorney General	Indiana Attorney General	Tennessee Attorney General	Montana Attorney General
FINES	YES 40M euros or up to 4% of global turnover for severe violations. 20M euros or up to 2% of global turnover for administrative violations.	YES Up to \$2,500 for administrative violations. Up to \$7,500 for each intentional violation.	YES Up to \$2,500 for administrative violations. Up to \$7,500 for each intentional violation and violations involving minors.	YES Up to \$7,500 for each violation.	YES Up to \$20,000 per violation.	YES Up to \$7,500 for each violation.	YES Up to \$5,000 for willful violations; Up to \$25,000 for violation of injunction. (violations of the CTDPA are enforceable under the Connecticut Unfair Trade Practices Act).	YES Up to \$7,500 for each violation.	YES Up to \$7,500 for each violation.	YES Up to \$7,500 for each violation. If the court finds the controller or processor willfully or knowingly violated TIPA, then the court may, in its discretion, award treble damages. There is an affirmative defense to violations if controller/processor has a WISP that complies with the specific security measures, in particular a WISP that complies with NIST privacy framework entitled "A Tool for Improving Privacy through Enterprise Risk Management Version 1.0."	YES Up to \$10,000 per violation (in accordance with Montana’s Unfair Trade Practices and Consumer Protection law where the MCDPA will be codified. The MCDPA does not express specific damages available.
PRIVATE RIGHT OF ACTION	YES	NO *Except for security breaches	NO *Except for security breaches	NO	NO	NO	NO	NO	NO	NO	NO

DEFINITIONS

	<u>GDPR</u> <u>(EU)</u>	<u>CCPA</u> <u>(CALIFORNIA)</u>	<u>CPRA</u> <u>(CALIFORNIA)</u>	<u>CDPA</u> <u>(VIRGINIA)</u>	<u>CPA</u> <u>(COLORADO)</u>	<u>UCPA</u> <u>(UTAH)</u>	<u>CTDPA</u> <u>(CONNECTICUT)</u>	<u>IO-CDPA</u> <u>(IOWA)</u>	<u>IN-CDPA</u> <u>(INDIANA)</u>	<u>TIPA</u> <u>(TENNESSEE)</u>	<u>MCDPA</u> <u>(MONTANA)</u>
CONSENT	Any freely-given, specific, informed and unambiguous indication of the data subject’s wishes.	N/A	Any freely-given, specific, informed, and unambiguous indication of the consumer’s wishes for a narrowly defined particular purpose. *Acceptance of a general or broad terms of use, or similar document, that contains descriptions of personal information processing along with other, unrelated information, does not constitute consent. Hovering over, muting, pausing, or closing a given piece of content does not constitute consent. Likewise, agreement obtained through the use of dark patterns does not constitute consent.	A clear affirmative act signifying a consumer’s freely-given, specific, informed, and unambiguous agreement to process personal data relating to the consumer. Consent may include a written statement, including a statement written by electronic means, or any other unambiguous affirmative action.	A clear affirmative act signifying a consumer’s freely-given, specific, informed, and unambiguous agreement, such as a written statement, including by electronic means, or other clear, affirmative action by which the consumer signifies the agreement to the processing of personal data. However, the following does not constitute consent: <ul style="list-style-type: none">– Acceptance of a general or broad terms of use or similar document that contains descriptions of personal data processing along with other, unrelated information.– Hovering over, muting, pausing, or closing a given piece of content.– Agreement obtained through dark patterns.	An affirmative act by a consumer that unambiguously indicates the consumer’s voluntary and informed agreement to allow a person to process personal data related to the consumer.	A clear affirmative act signifying a consumer’s freely-given, specific, informed and unambiguous agreement to allow the processing of personal data relating to the consumer. “Consent” may include a written statement, including by electronic means, or any other unambiguous affirmative action. “Consent” does not include: <ul style="list-style-type: none">– Acceptance of a general or broad terms of use or similar document that contains descriptions of personal data processing along with other, unrelated information.– Hovering over, muting, pausing, or closing a given piece of content.– Agreement obtained through the use of dark patterns.	A clear affirmative act signifying a consumer's freely given, specific, informed, and unambiguous agreement to process personal data relating to the consumer. -Consent - may include a written statement, including a statement written by electronic means, or any other unambiguous affirmative action.	A clear affirmative act that signifies a consumer's freely given, specific, informed, and unambiguous agreement to process personal data relating to the consumer. (b) For purposes of this section, a "clear affirmative act" includes a written statement, including a statement written by electronic means, or any other unambiguous affirmative action.	A clear affirmative act signifying a consumer's freely given, specific, informed, and unambiguous agreement to process personal information relating to the consumer; and may include a written statement, including a statement written by electronic means, or an unambiguous affirmative action’ “Consent” does not include: <ul style="list-style-type: none">– Acceptance of a general or broad terms of use or similar document that contains descriptions of personal data processing along with other unrelated information.– Hovering over, muting, pausing, or closing a given piece of content.– Agreement obtained through the use of dark patterns.	A clear affirmative act signifying a consumer's freely given, specific, informed, and unambiguous agreement to allow the processing of personal data relating to the consumer. The term may include a written statement, a statement by electronic means, or any other unambiguous affirmative action. “Consent” does not include: <ul style="list-style-type: none">– Acceptance of a general or broad terms of use or similar document that contains descriptions of personal data processing along with other unrelated information.– Hovering over, muting, pausing, or closing a given piece of content.– Agreement obtained through the use of dark patterns.
DE-IDENTIFIED DATA	N/A	Information that cannot reasonably be used to infer information about, or otherwise be linked to, a particular consumer provided that the business that uses de-identified information: <ul style="list-style-type: none">– Has implemented technical safeguards that prohibit reidentification of the consumer to whom the information may pertain.	Information that cannot reasonably be used to infer information about, or otherwise be linked to, a particular consumer, provided that the business that possesses the information: <ul style="list-style-type: none">– Takes reasonable measures to ensure that the information	Data that cannot reasonably be linked to an identified or identifiable natural person, or a device linked to such person.	Data that cannot reasonably be used to infer information about, or otherwise be linked to, an identified or identifiable individual, or a device linked to such if the controller that possesses the data: <ul style="list-style-type: none">– Takes reasonable measures to ensure that the data cannot be associated with an individual.	Data that cannot reasonably be linked to an identified individual or an identifiable individual; and are possessed by a controller who: <ul style="list-style-type: none">– Takes reasonable measures to ensure that a person cannot associate the data with an individual;– publicly commits to maintain and use the	Data that cannot reasonably be used to infer information about, or otherwise be linked to, an identified or identifiable individual, or a device linked to such individual, if the controller that possesses such data: <ul style="list-style-type: none">– Takes reasonable measures to ensure that such data cannot be associated with an individual;	Data that cannot reasonably be linked to an identified or identifiable natural person.	Data that cannot reasonably be linked to, an identified or identifiable individual because a controller that possesses the data: <ul style="list-style-type: none">– Takes reasonable measures to ensure that such data cannot be associated with an individual;– publicly commits to process such data only in a de-identified fashion and not attempt to re-identify such data, and– obligates any recipients of such data through contractual	Data that cannot reasonably be linked to an identified or identifiable natural person, or a device linked to that individual. <ul style="list-style-type: none">– Take reasonable measures to ensure that the data cannot be associated with a natural person;– Publicly commit to maintaining and using de-identified data	Data that cannot be used to reasonably infer information about or otherwise be linked to an identified or identifiable individual or a device linked to the individual if the controller that possesses the data: <ul style="list-style-type: none">– Takes reasonable measures to ensure that the data

	<u>GDPR</u> <u>(EU)</u>	<u>CCPA</u> <u>(CALIFORNIA)</u>	<u>CPRA</u> <u>(CALIFORNIA)</u>	<u>CDPA</u> <u>(VIRGINIA)</u>	<u>CPA</u> <u>(COLORADO)</u>	<u>UCPA</u> <u>(UTAH)</u>	<u>CTDPA</u> <u>(CONNECTICUT)</u>	<u>IO-CDPA</u> <u>(IOWA)</u>	<u>IN-CDPA</u> <u>(INDIANA)</u>	<u>TIPA</u> <u>(TENNESSEE)</u>	<u>MCDPA</u> <u>(MONTANA)</u>
		<ul style="list-style-type: none"> Has implemented business processes that specifically prohibit reidentification of the information. Has implemented business processes to prevent inadvertent release of de-identified information. Makes no attempt to re-identify the information. 	<ul style="list-style-type: none"> cannot be associated with a consumer or household. Publicly commits to maintain and use the information in de-identified form and not to attempt to re-identify the information. Contractually obligates any recipients of the information to comply with these requirements. 		<ul style="list-style-type: none"> Publicly commits to maintain and use the data only in a de-identified fashion and not attempt to re-identify the data. Contractually obligates any recipients of the information to comply with these requirements. 	<ul style="list-style-type: none"> data only in de-identified form and not attempt to re-identify the data; and contractually obligates any recipients of the data to comply with the requirements described above. 	<ul style="list-style-type: none"> publicly commits to process such data only in a de-identified fashion and not attempt to re-identify such data, and contractually obligates any recipients of such data to satisfy the criteria set forth above. 		requirements to comply with the requirements described above.	<ul style="list-style-type: none"> without attempting to re-identify the data; and Contractually obligate recipients of the de-identified data to comply with this part. 	<ul style="list-style-type: none"> cannot be associated with an individual; Publicly commits to process the data in a de-identified fashion only and to not attempt to re-identify the data; and Contractually obligates any recipients of the data to satisfy the criteria set forth above.
PERSONAL INFORMATION / PERSONAL DATA	<p>Any information relating to an identified or identifiable natural person.</p> <p>An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.</p>	<p>Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.</p> <p>*Personal information does not include publicly available information or lawfully obtained, truthful information that is a matter of public concern, or de-identified or aggregate consumer information.</p>	<p>Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.</p> <p>*Personal information does not include publicly available information or lawfully obtained, truthful information that is a matter of public concern or de-identified or aggregate consumer information.</p>	<p>Any information that is linked or reasonably linkable to a reasonably identifiable natural person.</p> <p>*Does not include de-identified data or publicly available information.</p>	<p>Information that is linked or reasonably linkable to an identified or identifiable individual.</p> <p>*Does not include de-identified data or publicly available information. Publicly available information that is lawfully made available from federal, state, or local government records and information that a controller has a reasonable basis to believe the consumer has lawfully made available to the generic public.</p>	<p>Information that is linked or reasonably linkable to an identified individual or an identifiable individual.</p> <p>*Does not include de-identified data, aggregated data, or publicly available information.</p>	<p>Information that is linked or reasonably linkable to an identified or identifiable individual.</p> <p>*Does not include de-identified data or publicly available information.</p>	<p>Information that is linked or reasonably linkable to an identified or identifiable natural person.</p> <p>*Does not include de-identified data or publicly available information.</p>	<p>Information that is linked or reasonably linkable to an identified or identifiable individual.</p> <p>*Does not include: de-identified data; aggregate data; or publicly available information.</p>	<p>Information is linked or reasonably linkable to an identified or identifiable natural person; and</p> <p>*Does not include: publicly available information; or de-identified or aggregate consumer information.</p>	<p>Information that is linked or reasonably linkable to an identified or identifiable individual.</p> <p>*Does not include de-identified data or publicly available information.</p>
PROFILING	Automated processing of personal data to analyze or predict a natural person’s performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements .	N/A	Any form of automated processing of personal information to evaluate certain personal aspects relating to a natural person and in particular to analyze or predict aspects concerning that natural person’s performance at work, economic situation, health, personal preferences, interests, reliability,	Any form of automated processing performed on personal data to evaluate, analyze, or predict personal aspects related to an identified or identifiable natural person’s economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.	Any form of automated processing of personal data to evaluate, analyze, or predict personal aspects concerning an identified or identifiable individual’s economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.	N/A	Any form of automated processing performed on personal data to evaluate, analyze or predict personal aspects related to an identified or identifiable individual’s economic situation, health, personal preferences, interests, reliability, behavior, location or movements.	N/A	Any form of solely automated processing performed on personal data to evaluate, analyze, or predict personal aspects related to an identified or identifiable individual's economic situation, health or health records, personal preferences, interests, reliability, behavior, location, or movements.	A form of solely automated processing performed on personal information to evaluate, analyze, or predict personal aspects related to an identified or identifiable natural person's economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.	Any form of automated processing performed on personal data to evaluate, analyze, or predict personal aspects related to an identified or identifiable individual's economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

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			behavior, location, or movements.								
PUBLICLY AVAILABLE INFORMATION	N/A	Information that is lawfully made available from federal, state, or local government records, or information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media; or information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience.	Information that is lawfully made available from federal, state, or local government records, or information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media; or information made available by a person to whom the consumer has disclosed the information if the consumer has not restricted the information to a specific audience.	Information that is lawfully made available through federal, state, or local government records, or information that a business has a reasonable basis to believe is lawfully made available to the general public through widely distributed media , by the consumer, or by a person to whom the consumer has disclosed the information, unless the consumer has restricted the information to a specific audience.	Information that is lawfully made available from federal, state, or local government records and information that a controller has a reasonable basis to believe the consumer has lawfully made available to the general public.”	Information that a person: (a) lawfully obtains from a record of a governmental entity; (b) reasonably believes a consumer or widely distributed media has lawfully made available to the general public; or (c) if the consumer has not restricted the information to a specific audience, obtains from a person to whom the consumer disclosed the information.	Information that is lawfully made available through federal, state or municipal government records or widely distributed media, and a controller has a reasonable basis to believe a consumer has lawfully made available to the general public.	Information that is lawfully made available through federal, state, or local government records, or information that a business has reasonable basis to believe is lawfully made available to the general public through widely distributed media , by the consumer, or by a person to whom the consumer has disclosed the information, unless the consumer has restricted the information to a specific audience.	Information that is lawfully made available through federal, state, or local government records; or that a business has a reasonable basis to believe is lawfully made available; (a) to the general public through widely distributed media; (b) by the consumer to whom the information pertains; or (c) by a person to whom the consumer has disclosed the information; unless the consumer has restricted the information to a specific audience.	Information that is lawfully made available through federal, state, or local government records, or information that a business has a reasonable basis to believe is lawfully made available to the general public through widely distributed media, by the consumer, or by a person to whom the consumer has disclosed the information, unless the consumer has restricted the information to a specific audience.	Information that: (a) is lawfully made available through federal, state, or municipal government records or widely distributed media; or (b) a controller has a reasonable basis to believe a consumer has lawfully made available to the public.
SALE	N/A	Selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating a consumer’s personal information to another business or a third party for monetary or other valuable consideration. Excludes: <ul style="list-style-type: none"> – Data shared at the consumer’s direction. – Data shared in connection with a merger. – Data shared with a service provider. – Data shared for the purpose of effectuating an opt-out right. – Data shared with a service provider that is necessary for a business purpose. 	Selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating a consumer’s personal information by the business to another business or a third party for monetary or other valuable consideration. Excludes: <ul style="list-style-type: none"> – Data shared at the consumer’s direction. – Data shared in connection with a merger. – Data shared with a service provider. – Data shared for the purpose of effectuating an opt-out right. 	Exchange of personal data for monetary consideration by the controller to a third party. Excludes: <ul style="list-style-type: none"> – Disclosure of personal data to a processor that processes the personal data on behalf of the controller; – Disclosure of personal data to a third party for purposes of providing a product or service requested by the consumer; – Disclosure or transfer of personal data to an affiliate of the controller; – Disclosure of information that the consumer (i) intentionally made available to the general public via a channel of mass 	Exchange of personal data for monetary or other valuable consideration by a controller to a third party. Excludes: <ul style="list-style-type: none"> – Disclosure of personal data to a processor that processes data on behalf of a controller; – Disclosure of personal data to a third party for purposes of providing a product or service requested by the consumer; – Disclosure or transfer of personal data to an affiliate of the controller; – Disclosure or transfer to a third party of personal data as an asset that is part of a proposed or actual merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or 	Exchange of personal data for monetary consideration by the controller to a third party. Excludes: <ul style="list-style-type: none"> – Disclosure of personal data of personal data to a processor who processes the personal data on behalf of the controller; – Disclosure of personal data to an affiliate of the controller; – Considering the context in which the consumer provided the personal data to the controller, a controller’s disclosure of personal data to a third party if the purpose is consistent with a consumer’s 	Exchange of personal data for monetary or other valuable consideration by the controller to a third party. Excludes: <ul style="list-style-type: none"> – Disclosure of personal data to a processor that processes the personal data on behalf of the controller, – Disclosure of personal data to a third party for purposes of providing a product or service requested by the consumer, – Disclosure or transfer of personal data to an affiliate of the controller, – Disclosure of personal data where the consumer directs the controller to disclose the personal data or intentionally uses the controller to interact with a third party, 	Exchange of personal data for monetary consideration by the controller to a third party. Excludes: <ul style="list-style-type: none"> – Disclosure of personal data to a processor that processes the personal data on behalf of the controller, – Disclosure of personal data to a third party for purposes of providing a product or service requested by the consumer, – Disclosure or transfer of personal data to an affiliate of the controller, – Disclosure of information that the consumer intentionally made available to the 	Exchange of personal data for monetary consideration by the controller to a third party. Excludes: <ul style="list-style-type: none"> – Disclosure of personal data to a processor that processes the personal data on behalf of the controller, – Disclosure of personal data to a third party for purposes of providing a product or service requested by the consumer, – Disclosure or transfer of personal data to an affiliate of the controller, – Disclosure of information that the consumer intentionally made available to the controller's assets. 	Exchange of personal information for valuable monetary consideration by the controller to a third party: Excludes: <ul style="list-style-type: none"> – Disclosure of personal information to a processor that processes the personal data on behalf of the controller; – Disclosure of personal information to a third party for purposes of providing a product or service requested by the consumer; – Disclosure or transfer of personal information to an affiliate of the controller; – Disclosure of information that the consumer: (a) Intentionally made available to the general public via a 	Exchange of personal data for monetary or other valuable consideration by the controller to a third party. Excludes: <ul style="list-style-type: none"> – Disclosure of personal data to a processor that processes the personal data on behalf of the controller; – Disclosure of personal data to a third party for the purposes of providing a product or service requested by the consumer; – Disclosure or transfer of personal data to an affiliate of the controller; – Disclosure of personal data in which the

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				media and (ii) did not restrict to a specific audience; or <ul style="list-style-type: none"> – Disclosure or transfer of personal data to a third party as an asset that is part of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of the controller’s assets. 	part of the controller’s assets; OR <ul style="list-style-type: none"> – Disclosure of personal data: <ul style="list-style-type: none"> ○ that a consumer directs the controller to disclose or intentionally discloses by using the controller to interact with a third party; or ○ intentionally made available by a consumer to the general public via a channel of mass media. Sec. 6-1-1303(23)	reasonable expectations; <ul style="list-style-type: none"> – Disclosure or transfer of personal data when a consumer directs a controller to: (A) disclose the personal data; or (B) interact with one or more third parties; – Consumer’s disclosure of personal data to a third party for the purpose of providing a product or service requested by the consumer or a parent or legal guardian of a child; – Disclosure of information that the consumer: (A) intentionally makes available to the general public via a channel of mass media; and (B) does not restrict to a specific audience; – A controller’s transfer of personal data to a third party as an asset that is part of a proposed or actual merger, an acquisition, or a bankruptcy in which the third party assumes control of all or part of the controller’s assets. 	<ul style="list-style-type: none"> – Disclosure of personal data that the consumer (i) intentionally made available to the general public via a channel of mass media, and (ii) did not restrict to a specific audience, or – Disclosure or transfer of personal data to a third party as an asset that is part of a merger, acquisition, bankruptcy or other transaction, in which the third party assumes control of all or part of the controller’s assets. 	general public via a channel of mass media and did not restrict to a specific audience, <ul style="list-style-type: none"> – Disclosure or transfer of personal data when a consumer uses or directs a controller to intentionally disclose personal data or intentionally interact with one or more third parties, – Disclosure or transfer of personal data to a third party as an asset that is part of a proposed or actual merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of the controller's assets. 		channel of mass media; and (b) Did not restrict to a specific audience; or Disclosure or transfer of personal information to a third party as an asset that is part of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of the controller's assets.	consumer directs the controller to disclose the personal data or intentionally uses the controller to interact with a third party; <ul style="list-style-type: none"> – Disclosure of personal data that the consumer: (A) intentionally made available to the public via a channel of mass media; and (B) did not restrict to a specific audience; or – Disclosure or transfer of personal data to a third party as an asset that is part of a merger, acquisition, bankruptcy, or other transaction, or a proposed merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of the controller's assets.
SENSITIVE DATA	Personal data revealing: <ul style="list-style-type: none"> – Racial or ethnic origin. – Political opinions. – Religious or philosophical beliefs. – Trade union membership. – Processing of genetic data, or biometric data for the purpose of uniquely identifying a natural person. 	N/A	Personal Information that reveals a consumer’s: <ul style="list-style-type: none"> – Social security, driver’s license, state identification card, or passport number. – Account login, financial account, debit card, or 	Personal data revealing: <ul style="list-style-type: none"> – Racial or ethnic origin. – Religious beliefs. – Mental or physical health diagnosis. – Sexual orientation. – Citizenship or immigration status. – Genetic or biometric data for the purpose 	Personal data revealing: <ul style="list-style-type: none"> – Racial or ethnic origin. – Religious beliefs. – Mental or physical health condition or diagnosis. – Sex life or sexual orientation. – Citizenship or citizenship status. 	Personal data that reveals: <ul style="list-style-type: none"> – Racial or ethnic origin. – Religious beliefs. – Mental or physical health condition or diagnosis. – Sexual orientation. – Citizenship or immigration status. – Information regarding an individual’s medical 	Personal data that includes data revealing: <ul style="list-style-type: none"> – Racial or ethnic origin. – Religious beliefs. – Mental or physical health condition or diagnosis. – Sex life or sexual orientation. – Citizenship or immigration status. 	Personal data includes: <ul style="list-style-type: none"> – Racial or ethnic origin. – Religious beliefs. – Mental or physical health condition or diagnosis. – Sexual orientation. – Citizenship or immigration status. 	Personal data that includes: <ul style="list-style-type: none"> – Racial or ethnic origin. – Religious beliefs. – Mental or physical health condition or diagnosis made by a health care provider. – Sexual orientation. – Citizenship or immigration status. 	Personal data that includes data revealing: <ul style="list-style-type: none"> – Racial or ethnic origin. – Religious beliefs. – Mental or physical health condition or diagnosis. – Sexual orientation. – Citizenship or immigration status. 	Personal data that includes data revealing: <ul style="list-style-type: none"> – Racial or ethnic origin. – Religious beliefs. – Mental or physical health condition or diagnosis. – Sex life or sexual orientation, or

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	<ul style="list-style-type: none"> – Health data. – Sex life or sexual orientation. 		<ul style="list-style-type: none"> credit card number in combination with any required security or access code, password, or credentials allowing access to an account. – Precise geolocation. – Racial or ethnic origin, religious or philosophical beliefs, or union membership. – The contents of a consumer’s mail, email and text messages, unless the business is the intended recipient of the communication. – Genetic data. – Biometric Information for the purpose of uniquely identifying a consumer. – Health information. – Sex life or sexual orientation. 	<ul style="list-style-type: none"> of uniquely identifying a natural person. – Children’s data. – Precise geolocation data. 	<ul style="list-style-type: none"> – Genetic or biometric data that may be processed for the purpose of uniquely identifying an individual. – Personal data known from a child (individuals under 13). 	<ul style="list-style-type: none"> history, mental or physical health. – Condition, or medical treatment or diagnosis by a health care professional – Processing of genetic personal data or biometric data, if the processing is for the purpose of identifying a specific individual. – Specific geolocation data. – Excludes personal data that reveals an individual’s: – Racial or ethnic origin, if the personal data are processed by a video communication service; – If the personal data are processed by a person licensed to provide health care under Title 26, Chapter 21, Health Care Facility Licensing and Inspection Act, or Title 58, Occupations and Professions, information regarding an individual’s medical history, mental or physical health condition, or medical treatment or diagnosis by a health care professional. 	<ul style="list-style-type: none"> – Processing of genetic or biometric data for the purpose of uniquely identifying an individual – Personal data collected from a known child, or – Precise geolocation data. 	<ul style="list-style-type: none"> – Genetic or biometric data for the purpose of uniquely identifying an individual – Personal data collected from a known child, or – Precise geolocation data. 	<ul style="list-style-type: none"> – Genetic or biometric data for the purpose of uniquely identifying a specific individual. – Personal data collected from a known child, or – Precise geolocation data. 	<ul style="list-style-type: none"> – Genetic or biometric data for the purpose of uniquely identifying a natural person. – Personal information collected from a known child, or – Precise geolocation data. 	<ul style="list-style-type: none"> – Citizenship or immigration status; – Genetic or biometric data for the purpose of uniquely identifying an individual – Personal data collected from a known child; or – Precise geolocation data
SHARE	N/A	N/A	Sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

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			<p>electronic or other means, a consumer’s personal information by the business to a third party for cross-context behavioral advertising (defined below), whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged.</p> <p>A business does not share personal information for cross-context behavioral advertising when:</p> <ul style="list-style-type: none"> – A consumer uses or directs the business to intentionally disclose personal information or intentionally interact with one or more third parties. – The business uses or shares an identifier for a consumer who has opted out of the sharing of the consumer’s personal information or limited the use of the consumer’s sensitive personal information for the purposes of alerting persons that the consumer has opted out of the sharing of the consumer’s personal information or limited the use of 								

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			<p>the consumer’s sensitive personal information.</p> <ul style="list-style-type: none"> – The business transfers to a third party the personal information of a consumer as an asset that is part of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of the business, provided that information is used or shared consistently with this title. 								
TARGETED ADVERTISING	N/A	N/A	<p>“Cross-context behavioral advertising”: the targeting of advertising to a consumer based on the consumer’s personal information obtained from the consumer’s activity across businesses, distinctly-branded websites, applications, or services, other than the business, distinctly-branded website, application, or service with which the consumer intentionally Interacts.</p>	<p>Displaying advertisements to a consumer where the advertisement is selected based on personal data obtained from that consumer’s activities over time and across nonaffiliated websites or online applications to predict such consumer’s preferences or interests.</p> <p>“Targeted advertising” does not include:</p> <ul style="list-style-type: none"> – Advertisements based on activities within a controller’s own websites or online applications. – Advertisements based on the context of a consumer’s current search query, visit to a website, or online application. – Advertisements directed to a consumer in response to the consumer’s request for 	<p>Displaying to a consumer an advertisement that is selected based on personal data obtained or inferred over time from the consumer’s activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests.</p> <p>“Targeted advertising” does not include:</p> <ul style="list-style-type: none"> – Advertisements based on activities within a controller’s own websites or online applications. – Advertisements based on the context of a consumer’s current search query, visit to a website, or online application. – Advertising to a consumer in response to the consumer’s request for information or feedback. – Processing personal data solely for measuring or reporting advertising 	<p>Displaying an advertisement to a consumer where the advertisement is selected based on personal data obtained from the consumer’s activities over time and across nonaffiliated websites or online applications to predict the consumer’s preferences or interests.</p> <p>“Targeted advertising” does not include:</p> <ul style="list-style-type: none"> – Advertising based on a consumer’s activities within a controller’s website or online application or any affiliated website or online application; – Advertising based on the context of a consumer’s current search query or visit to a website or online application; – Advertising directed to a consumer in 	<p>Displaying advertisements to a consumer where the advertisement is selected based on personal data obtained or inferred from that consumer’s activities over time and across nonaffiliated Internet websites or online applications to predict such consumer’s preferences or interests.</p> <p>“Targeted advertising” does not include</p> <ul style="list-style-type: none"> – Advertisements based on activities within a controller’s own Internet websites or online applications, – Advertisements based on the context of a consumer’s current search query, visit to an Internet website or online application, – Advertisements directed to a consumer in response to the consumer’s request for information or feedback, or 	<p>Displaying advertisements to a consumer where the advertisement is selected based on personal data obtained from that consumer’s activities over time and across nonaffiliated websites or online applications to predict such consumer’s preferences or interests.</p> <p>“Targeted advertising” does not include the following:</p> <ul style="list-style-type: none"> – Advertisements based on activities within a controller’s own or affiliated websites or online applications; – Advertisements based on the context of a consumer’s current search query, visit to a website, or online application; – Advertisements directed to a consumer in 	<p>Displaying advertisements to a consumer in which the advertisement is selected based on personal data obtained or inferred from that consumer’s activities over time and across nonaffiliated websites or online applications to predict such consumer’s preferences or interests.</p> <p>“Targeted advertising” does not include:</p> <ul style="list-style-type: none"> – Advertisements based on activities within a controller’s own websites or online applications, – Advertisements based on the context of a consumer’s current search query, visit to a website or online application, – Advertisements directed to a consumer in response to the consumer’s request for information or feedback, or – Processing personal data solely to measure or report advertising performance, reach, or frequency. 	<p>Displaying to a consumer an advertisement that is selected based on personal information obtained from that consumer’s activities over time and across nonaffiliated websites or online applications to predict the consumer’s preferences or interests.</p> <p>“Targeted advertising” does not include:</p> <ul style="list-style-type: none"> – Advertisements based on activities within a controller’s own websites or online applications, – Advertisements based on the context of a consumer’s current search query, visit to a website or online application, – Advertisements directed to a consumer in response to the consumer’s request for information or feedback, or – Personal information processed solely for 	<p>Displaying advertisements to a consumer in which the advertisement is selected based on personal data obtained or inferred from that consumer’s activities over time and across nonaffiliated internet websites or online applications to predict the consumer’s preferences or interests</p> <p>“Targeted advertising” does not include:</p> <ul style="list-style-type: none"> – Advertisements based on activities within a controller’s own internet websites or online applications; – Advertisements based on the context of a consumer’s current search query or visit to an internet

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				information or feedback. – Processing personal data processed solely for measuring or reporting advertising performance, reach, or frequency.	performance, reach, or frequency.	response to the consumer’s request for information, product, a service, or feedback; or – Advertising processing personal data solely to measure or report advertising: (A) performance; (B) reach; or (C) frequency.	– Processing personal data solely to measure or report advertising frequency, performance or reach.	response to the consumer's request for information or feedback; or – Processing personal data solely for measuring or reporting advertising performance, reach, or frequency.		measuring or reporting advertising performance, reach, or frequency.	website or online application; – Advertisements directed to a consumer in response to the consumer's request for information or feedback; or – Processing personal data solely to measure or report advertising frequency, performance, or reach.