

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) and Connecticut's Data Privacy Act (CTDPA). 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
5. Documenting your cybersecurity program

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Effective Dates

	GDPR (EU)	CCPA (CALIFORNIA)	CPRA (CALIFORNIA)	CDPA (VIRGINIA)	CPA (COLORADO)	UCPA (UTAH)	CTDPA (CONNECTICUT)
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
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
Implementing Regulation	N/A (*Certain member states have implemented member-state specific legislation)	*Regulations effective August 14, 2020	*The first package of regulations is expected to be finalized in April 2023. Regulations will be an ongoing process.	A working group of government, business, and privacy representatives will review issues related to implementation and submit best practices no later than November 1, 2021.	Opinion letters and interpretive guidance on what constitutes a violation of the Act will be issued in January 1, 2025. The regulation process is ongoing. Regulations will establish technical specifications for valid user-enabled universal opt out mechanisms by July 1, 2023.	N/A	The CTDPA does not provide explicit authority for the attorney general to issue regulations.

SCOPE

	GDPR (EU)	CCPA (CALIFORNIA)	CPRA (CALIFORNIA)	CDPA (VIRGINIA)	CPA (COLORADO)	UCPA (UTAH)	CTDPA (CONNECTICUT)
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. 	<p>Applies to companies that do business in California and:</p> <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. 	<p>Applies to companies that do business in California and:</p> <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. 	<p>Applies to businesses that:</p> <ul style="list-style-type: none"> - Conduct business in the Commonwealth or produce products or services that are targeted to residents of the Commonwealth, AND - Process or control data of a least 100,000 consumers, OR - Process or control data of at least 25,000 consumers + derive over 50% of gross revenue from selling personal data. 	<p>Applies to controllers that:</p> <ul style="list-style-type: none"> - Conduct business or produce commercial products or services that are intentionally targeted to Colorado residents, AND - Control or process personal data of more than 100,000 consumers per calendar year; OR - Derive revenue from the sale of personal data and control or process the personal data of at least 25,000 consumers. 	<p>Applies to controllers that:</p> <ul style="list-style-type: none"> - Conduct business or produce commercial products or services that are intentionally targeted to Colorado residents, AND - Control or process personal data of more than 100,000 consumers per calendar year; OR - Derive revenue from the sale of personal data and control or process the personal data of at least 25,000 consumers. 	<p>Applies to persons that:</p> <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. - Controlled or processed the personal data of not less than 100,000 consumers, excluding personal data processed solely for the purpose of completing a payment transaction; OR - Controlled 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.
EXEMPT BUSINESSES	<ul style="list-style-type: none"> - Activities that fall outside the scope of Union law. - Activities of a natural person in the course of a purely personal or household activity - Activities of the competent authorities for the prevention, investigation, 	<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

	GDPR (EU)	CCPA (CALIFORNIA)	CPRA (CALIFORNIA)	CDPA (VIRGINIA)	CPA (COLORADO)	UCPA (UTAH)	CTDPA (CONNECTICUT)
	detection or prosecution of criminal offenses.						
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	<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	<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
EMPLOYEE DATA EXEMPTION	NO	YES	NO	YES	YES	YES	YES
B2B EXEMPTION	NO	YES	NO*	YES	YES	YES	YES
EXEMPTION FOR PSEUDONYMOUS DATA	NO	NO	NO	YES* *Does not give an exemption to an opt-out to sale, target advertising or profiling	YES* *Does not give an exemption to an opt-out to sale, target advertising or profiling	YES* *Does not give an exemption to an opt-out to sale, target advertising or profiling	YES* *Does not give an exemption to an opt-out to sale, target advertising or profiling
EXEMPTION FOR AGGREGATE DATA	YES	YES	YES	YES	YES	YES	NOT EXPLICIT
EXEMPTION FOR DE-IDENTIFIED DATA	YES	YES	YES	YES	YES	YES	YES

OPT-IN/OPT-OUT REQUIREMENTS

	GDPR (EU)	CCPA (CALIFORNIA)	CPRA (CALIFORNIA)	CDPA (VIRGINIA)	CPA (COLORADO)	UCPA (UTAH)	CTDPA (CONNECTICUT)
OPT-IN CONSENT REQUIRED FOR PROCESSING?	<ul style="list-style-type: none"> Only when consent is the lawful basis for processing. Under e-Privacy, consent is required for cookies/other tracking technologies. 	NO* *Except for the sale of personal information of minors	NO* *Except for the sale/sharing of personal information of minors for cross-contextual advertising and before processing personal data for certain unnecessary or incompatible secondary purposes	NO* *Except for sensitive personal information (includes information collected from children) and before processing personal data for certain unnecessary or incompatible secondary purposes .	NO* *Except for sensitive personal information (includes information collected from children) and before processing personal data for certain unnecessary or incompatible secondary purposes .	NO* *Except for the personal information of a known child under 13.	NO* *Except for sensitive personal information (and information collected from children under 13) and except for the sale of targeted advertising using personal data of minors 13 to 16.
OPT-OUT OF SALE	*N/A *General right to object to processing/withdraw consent	YES	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
OPT-OUT OF AUTOMATED DECISION-MAKING/ PROFILING WITH SIGNIFICANT OR LEGAL EFFECTS	YES	NO	YES	YES	YES	NO	YES
OPT-OUT/OPT-IN TO SENSITIVE PERSONAL INFORMATION	OPT-IN	N/A	OPT-OUT	OPT-IN	OPT-IN	OPT-OUT	YES
REQUIRED TO RESPOND TO OPT-OUT PREFERENCE SIGNALS	N/A	YES	YES	YES	YES* *Effective July 1, 2024	NO	YES* *Effective January 1, 2025

OTHER CONSUMER RIGHTS

	GDPR (EU)	CCPA (CALIFORNIA)	CPRA (CALIFORNIA)	CDPA (VIRGINIA)	CPA (COLORADO)	UCPA (UTAH)	CDTPA (CONNECTICUT)
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
RIGHT TO ACCESS TO PERSONAL INFORMATION	YES	YES	YES	YES	YES	YES	YES
RIGHT TO CORRECT INACCURACIES	YES	NO	YES	YES	YES	NO	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
RIGHT TO DELETE/ERASE	YES	YES	YES	YES	YES	YES	YES
CONSUMER APPEALS PROCESS REQUIRED (if the controller decides not to take action on a consumer request)	NO	NO	NO	YES	YES	NO	YES

BUSINESS OBLIGATIONS

	GDPR (EU)	CCPA (CALIFORNIA)	CPRA (CALIFORNIA)	CDPA (VIRGINIA)	CPA (COLORADO)	UCPA (UTAH)	CTDPA (CONNECTICUT)
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)
REQUIREMENT TO AUTHENTICATE CONSUMER REQUEST	YES	YES	YES	YES	YES	YES	YES
REQUIRE TO PRACTICE DATA MINIMIZATION	YES	NO	YES	YES	YES	NO	YES
REQUIRE TO PRACTICE PURPOSE LIMITATION	YES	NO	YES	YES	YES	NO	YES
REQUIRED TO PROVIDE ADMINISTRATIVE, TECHNICAL AND PHYSICAL SECURITY CONTROLS	YES	YES	YES	YES	YES	YES	YES
RESTRICTIONS ON DISCRIMINATION (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).	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	YES* *Does not prohibit loyalty, rewards, premium features, discounts, or club card programs	YES* *Does not prohibit loyalty, rewards, premium features, discounts, or club card programs	YES* *Does not prohibit loyalty, rewards, premium features, discounts, or club card programs	YES* *Does not prohibit loyalty, rewards, premium features, discounts, or club card programs	YES* *Does not prohibit loyalty, rewards, premium features, discounts, or club card programs
ASSESSMENTS REQUIRED	YES* *For high- risk activities	NO	YES* *Cybersecurity assessments	YES* *High risk activities	YES* *High risk activities	NO	YES* *High risk activities

PROCESSOR OBLIGATIONS

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

LIABILITY/ENFORCEMENT

	GDPR (EU)	CCPA (CALIFORNIA)	CPRA (CALIFORNIA)	CDPA (VIRGINIA)	CPA (COLORADO)	UCPA (UTAH)	CTDPA (CONNECTICUT)
CURE PERIOD	NO	30 Days	NO	30 Days	60 days until provision expires on Jan. 1, 2025	30 Days	60 days until provision expires January 1, 2025.
ENFORCING AGENCY	Member state data protection authority (DPA)	Office of California's Attorney General's Office	Office of California's Attorney General's Office + *California Privacy Protection Agency *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	Connecticut Attorney General
FINES	40M euros or up to 4% of global turnover for severe violations 20M euros or up to 2% of global turnover for administrative violations	Up to \$2,500 for administrative violations. Up to \$7500 for each intentional violation	Up to \$2,500 for administrative violations. Up to \$7500 for each intentional violation and violations involving minors.	Up to \$7,500 for each violation	Up to \$20,000 per violation.	Up to \$7,500 for each violation	Up to \$5,000 for willful violations Up to \$25,000 for violation of injunction.
PRIVATE RIGHT OF ACTION	YES	NO* *Except for security breaches	NO* *Except for security breaches	NO	NO	NO	NO

DEFINITIONS

	GDPR (EU)	CCPA (CALIFORNIA)	CPRA (CALIFORNIA)	CDPA (VIRGINIA)	CPA (COLORADO)	UCPA (UTAH)	CTDPA (CONNECTICUT)
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 terms of use or privacy policy is not sufficient. Hovering over, muting, pausing, or closing a given piece of content does not constitute consent. 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.	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. *Acceptance of a terms of use or privacy policy is not sufficient. Hovering over, muting, pausing, or closing a given piece of content does not constitute consent. Agreement obtained through the use of dark patterns does not constitute consent.	An affirmative act by a consumer that unambiguously indicates the consumer's voluntary and informed agreement.	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. May include a written statement, including by electronic means, or any other unambiguous affirmative action. *Acceptance of a general or broad terms of use or similar document that contains descriptions of personal data processing along with other, unrelated information is not sufficient. Hovering over, muting, pausing, or closing a given piece of content does not constitute consent. Agreement obtained through the use of dark patterns does not constitute consent.
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 deidentified information: 1. Has implemented technical safeguards that prohibit reidentification of the consumer to whom the	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: 1. Takes reasonable measures to ensure that the information cannot be associated with a consumer or household 2. Publicly commits to	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: 1. Takes reasonable measures to ensure that the data cannot be associated with an individual 2. Publicly commits to	Data that cannot reasonably be linked to an identified individual or an identifiable individual; if the controller that possesses the data: 1. Takes reasonable measures to ensure that the data cannot be associated with an individual 2. Publicly commits to	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: 1. Takes reasonable measures to ensure that such data cannot be associated with an individual

	GDPR (EU)	CCPA (CALIFORNIA)	CPRA (CALIFORNIA)	CDPA (VIRGINIA)	CPA (COLORADO)	UCPA (UTAH)	CTDPA (CONNECTICUT)
		information may pertain 2. Has implemented business processes that specifically prohibit reidentification of the information 3. Has implemented business processes to prevent inadvertent release of deidentified information 4. Makes no attempt to reidentify the information	maintain and use the information in de-identified form and not to attempt to re-identify the information 3. Contractually obligates any recipients of the information to comply with these requirements		maintain and use the data only in a de-identified fashion and not attempt to re-identify the data 3. Contractually obligates any recipients of the information to comply with these requirements	maintain and use the data only in a de-identified fashion and not attempt to re-identify the data 3. Contractually obligates any recipients of the information to comply with these requirements	2. Publicly commits to process such data only in a de-identified fashion and not attempt to re-identify such data 3. Contractually obligates any recipients of such data to satisfy the criteria set forth above
PERSONAL INFORMATION /PERSONAL DATA	Any information relating to an identified or identifiable natural person. 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, and 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.	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. *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.	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. *Personal information does not include publicly available information or lawfully obtained, truthful information that is a matter of public concern or deidentified or aggregate consumer information.	Any information that is linked or reasonably linkable to a reasonably identifiable natural person. *Does not include deidentified data or publicly available information.	Information that is linked or reasonably linkable to an identified or identifiable individual. *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.	Information that is linked or reasonably linkable to an identified individual or an identifiable individual. *Personal data" does not include deidentified data, aggregated data, or publicly available information.	Information that is linked or reasonably linkable to an identified or identifiable individual. *Does not include de-identified data or publicly available information
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	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,	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,	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,

	GDPR (EU)	CCPA (CALIFORNIA)	CPRA (CALIFORNIA)	CDPA (VIRGINIA)	CPA (COLORADO)	UCPA (UTAH)	CTDPA (CONNECTICUT)
			preferences, interests, reliability, behavior, location, or movements.	reliability, behavior, location, or movements.	location, or movements.		reliability, 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 by the consumer; 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 by the consumer; 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
SALE	N/A	Exchange of personal information for monetary or other valuable consideration. Excludes: <ol style="list-style-type: none"> 1. Data shared at the consumer’s direction 2. Data shared in connection with a merger. 3. Data shared with a service provider. 4. Data shared to effectuate an opt-out right. 5. Data shared with a service provider that is necessary for a business purpose. 	Exchange of personal information for monetary or other valuable consideration. Excludes: <ol style="list-style-type: none"> 1. Data shared at the consumer’s direction. 2. Data shared in connection with a merger. 3. Data shared with a service provider. 4. Data shared to effectuate an opt-out right. 5. Data shared with a service provider that is necessary for a business purpose. 	Exchange of personal data for monetary consideration by the controller to a third party. Excludes: <ol style="list-style-type: none"> 1. The disclosure of personal data to a processor that processes the personal data on behalf of the controller; 2. The disclosure of personal data to a third party for purposes of providing a product or service requested by the consumer; 3. The disclosure or transfer of personal data to an affiliate of the controller; 4. The disclosure of information that the consumer (i) intentionally made available to the general public via a channel 	Exchange of personal information for monetary or other valuable consideration. Excludes: <ol style="list-style-type: none"> 1. The disclosure of personal data to a processor that processes data on behalf of a controller; 2. The disclosure of personal data to a third party for purposes of providing a product or service requested by the consumer; 3. The disclosure or transfer of personal data to an affiliate of the controller; 4. The 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 	Exchange of personal data for monetary consideration by a controller to a third party. Excludes: <ol style="list-style-type: none"> 1.A controller’s disclosure of personal data to a processor who processes the personal data on behalf of the controller 2.A controller’s disclosure of personal data to an affiliate of the controller 3.Considering the context in which the consumer provided the personal data to the controller, a controller’s disclosure of personal data to a 	Exchange of personal data for monetary or other valuable consideration by the controller to a third party. Excludes: <ol style="list-style-type: none"> 1. Disclosure of personal data to a processor that processes the personal data on behalf of the controller 2. Disclosure of personal data to a third party for purposes of providing a product or service requested by the consumer 3. Disclosure or transfer of personal data to an affiliate of the controller 4. Disclosure of personal data where the consumer directs the

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				of mass media and (ii) did not restrict to a specific audience; or 5. The 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.	all or part of the controller's assets; OR 5. The disclosure of personal data: (a) that a consumer directs the controller to disclose or intentionally discloses by using the controller to interact with a third party; or (b) Intentionally made available by a consumer to the general public via a channel of mass media. 6-1-1303(23)	third party if the purpose is consistent with a consumer's reasonable expectations; 4. The disclosure or transfer of personal data at the consumer's direction. 5. A 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 6. The disclosure of information that the consumer intentionally makes available to the general public via a channel of mass media; and does not restrict to a specific audience; or 7. 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.	controller to disclose the personal data or intentionally uses the controller to interact with a third party 5. 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, 6. 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: - Racial or ethnic origin - Political opinions - Religious or philosophical beliefs - Trade union	N/A	Personal Information that reveals a consumer's: - Social security, driver's license, state identification card, or passport number. - Account login, financial	Personal data revealing: - Racial or ethnic origin - Religious beliefs, - Mental or physical health diagnosis, - Sexual orientation,	Personal data revealing: - Racial or ethnic origin - Religious beliefs - A mental or physical health condition or diagnosis - -Sex life or sexual	Personal data that reveals: - Racial or ethnic origin; - Religious beliefs; - Sexual orientation; - Citizenship or immigration status;	Personal data that includes data revealing: - Racial or ethnic origin. - Religious beliefs - Mental or physical health condition or

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	<ul style="list-style-type: none"> membership Processing of genetic data, biometric data for the purpose of uniquely identifying a natural person Health data Sex life or sexual orientation 		<ul style="list-style-type: none"> account, debit .card, or 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"> Citizenship or immigration status. Genetic or biometric data used to uniquely identify a natural person. Children's data. Precise geolocation data. 	<ul style="list-style-type: none"> orientation, Citizenship or citizenship status Genetic or biometric data that may be processed for the purpose of uniquely identifying an individual, or Personal data known from a child (individuals under 13) 	<ul style="list-style-type: none"> Medical history, mental or physical health, condition, or medical treatment or diagnosis by a health care professional; Genetic personal data or biometric data, if the processing is for the purpose of identifying a specific individual; or Specific geolocation data. 	<ul style="list-style-type: none"> diagnosis. Sex life or sexual orientation Citizenship or immigration status. Processing of genetic or biometric data for the purpose of uniquely identifying an individual Personal data collected from a known child, Precise geolocation data.
SHARE	N/A	N/A	<p>Sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by 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-</p>	N/A	N/A	N/A	N/A

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			<p>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 businesses uses or shares an identifier to communicate an opt-out – 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. 				
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> <ol style="list-style-type: none"> 1. Advertisements based on activities within a controller's own websites or online applications; 2. Advertisements based on the context of a consumer's current search query, visit to a website, or online 	<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> <ol style="list-style-type: none"> 1. Advertisements based on activities within a controllers own websites or online applications; 2. Advertisements based on the context of a consumer's current search query, visit to a website, or online application; 3. Advertising to a consumer in response to the consumer's 	<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 advertising:</p> <ol style="list-style-type: none"> 1. Based on a consumer's activities within a controller's website or online application or any 	<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> <ol style="list-style-type: none"> 1. Advertisements based on activities within a controller's own Internet websites or online applications 2. Advertisements based on the context of a consumer's current

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				application; 3. Advertisements directed to a consumer in response to the consumer's request for information or feedback; or 4. Processing personal data processed solely for measuring or reporting advertising performance, reach, or frequency.	request for information or feedback; 4. Processing personal data solely for measuring or reporting advertising performance, reach, or frequency.	affiliated website or online application; 2. Based on the context of a consumer's current search query or visit to a website or online application; 3. Directed to a consumer in response to the consumer's request for information, product, a service, or feedback; or 4. Processing personal data solely to measure or report advertising: performance; reach; or frequency.	search query, visit to an Internet website or online application 3. Advertisements directed to a consumer in response to the consumer's request for information or feedback 4. Processing personal data solely to measure or report advertising frequency, performance or reach.