

	California Consumer Privacy Act (CCPA)	California Privacy Rights Act (CPRA)	Colorado Privacy Act (CPA)	Connecticut Data Privacy Act (CTDPA)	Utah Consumer Privacy Act (UCPA)	Virginia Consumer Data Protection Act (VCDPA)
<b>Date of effect</b>	January 1, 2020	January 1, 2023	July 1, 2023	July 1, 2023	December 31, 2023	January 1, 2023
<b>Law applies to</b>	A “business” that meets at least one threshold below: <ul style="list-style-type: none"> <li>Generates over \$25M in annual gross revenue;</li> <li>Handles the records of at least 50,000 California consumers; or</li> <li>Generates over 50% in annual revenue from sales of consumer data.</li> </ul>	Same as CCPA, except the threshold for handling records of California consumers increases from 50,000 to 100,000.	Applies to businesses that: <ul style="list-style-type: none"> <li>Handle the records of at least 100,000 Colorado consumers; or</li> <li>Handle the records of at least 25,000 Colorado consumers <i>and</i> derive revenue from sales of consumer data.</li> </ul>	Applies to businesses that: <ul style="list-style-type: none"> <li>Handle the records of at least 100,000 Connecticut consumers; or</li> <li>Handle the records of at least 25,000 Connecticut consumers <i>and</i> derives over 25% in gross revenue from data sales.</li> </ul>	Applies to businesses that: <ul style="list-style-type: none"> <li>Generate over \$25M in annual gross revenue; <i>and</i></li> <li>meet at least one threshold below: <ul style="list-style-type: none"> <li>Handle the records of at least 100,000 Utah consumers; <i>or</i></li> <li>Generate over 50% in annual revenue from data sales of 25,000 or more Utah consumers.</li> </ul> </li> </ul>	Applies to businesses that: <ul style="list-style-type: none"> <li>Handle the records of at least 100,000 Virginia consumers; or</li> <li>Handle the records of at least 25,000 Virginia consumers <i>and</i> derive over 50% in gross revenue from sales of consumer data.</li> </ul>
<b>Definition of personal data</b>	Any information that could be associated or linked with a particular	Same as CCPA, except	“Information that is linked or reasonably linkable to an identified or	“Information that is linked or reasonably linkable to an identified	“Information that is linked or reasonably linkable to an identified or	“Any information that is linked or reasonably linkable to an identified

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	consumer or household.	that there is a reasonableness element:  Any information that could be <i>reasonably</i> associated or linked with a particular consumer or household.	identifiable individual.”  Does not include de-identified data or publicly available information.  Excludes natural persons acting in a commercial or employment context.	or identifiable individual.”  Does not include de-identified data or publicly available information.  Excludes natural persons acting in a commercial or employment context.	identifiable individual.”  Does not include de-identified data or publicly available information.  Excludes natural persons acting in a commercial or employment context.	or identifiable natural person.”  Does not include de-identified data or publicly available information.  Excludes natural persons acting in a commercial or employment context.
<b>Definition of sensitive personal data</b>	Does not define sensitive personal data.	Defines sensitive personal data to include: <ul style="list-style-type: none"> <li>• Social security number;</li> <li>• Driver’s license number;</li> <li>• Account log-in, debit, or credit card number in</li> </ul>	Defines sensitive personal data to include personal data revealing: <ul style="list-style-type: none"> <li>• racial or ethnic origin;</li> <li>• religious beliefs;</li> <li>• a mental or physical health condition or diagnosis;</li> </ul>	Defines sensitive personal data to include personal data revealing: <ul style="list-style-type: none"> <li>• racial or ethnic origin;</li> <li>• religious beliefs;</li> <li>• a mental or physical health condition or diagnosis;</li> </ul>	Defines sensitive personal data to include personal data that reveals: <ul style="list-style-type: none"> <li>• racial or ethnic origin;</li> <li>• religious beliefs;</li> <li>• sexual orientation;</li> <li>• citizenship or immigration status;</li> </ul>	Defines sensitive personal data to include personal data revealing: <ul style="list-style-type: none"> <li>• racial or ethnic origin;</li> <li>• religious beliefs;</li> <li>• a mental or physical health diagnosis;</li> </ul>

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		<ul style="list-style-type: none"> <li>combination with password or PIN;</li> <li>Precise geolocation;</li> <li>Racial/ethnic origins;</li> <li>Religious or philosophical beliefs;</li> <li>Union membership;</li> <li>Contents of e-mails or texts to others;</li> <li>Genetic/biometric data;</li> <li>Health information;</li> <li>Sex life/sexual orientation data.</li> </ul>	<ul style="list-style-type: none"> <li>sex life or sexual orientation;</li> <li>citizenship or citizenship status;</li> <li>Genetic or biometric data that may be processed for the purpose of uniquely identifying an individual; or,</li> <li>Personal data from a known child.</li> </ul>	<ul style="list-style-type: none"> <li>sex life or sexual orientation;</li> <li>citizenship or immigration status;</li> <li>Genetic or biometric data that may be processed for the purpose of uniquely identifying an individual; or,</li> <li>Personal data from a known child; or,</li> <li>Precise geolocation data.</li> </ul>	<ul style="list-style-type: none"> <li>medical history, mental or physical health condition, or medical treatment or diagnosis by a health care professional;</li> <li>genetic personal data or biometric data, if the processing is for the purpose of identifying a specific individual; or,</li> <li>specific geolocation data.</li> </ul>	<ul style="list-style-type: none"> <li>sexual orientation; or</li> <li>citizenship or immigration status;</li> <li>Genetic or biometric data for the purpose of uniquely identifying a natural person;</li> <li>Personal data from a known child; or,</li> <li>Precise geolocation data.</li> </ul>
<b>Consumer rights</b>	<ul style="list-style-type: none"> <li>Access</li> <li>Deletion</li> <li>Non-Discrimination</li> </ul>	<ul style="list-style-type: none"> <li>Access</li> <li>Deletion</li> </ul>	<ul style="list-style-type: none"> <li>Access</li> <li>Correction</li> <li>Deletion</li> </ul>	<ul style="list-style-type: none"> <li>Access</li> <li>Correction</li> <li>Deletion</li> </ul>	<ul style="list-style-type: none"> <li>Access</li> <li>Deletion</li> <li>Portability</li> </ul>	<ul style="list-style-type: none"> <li>Access</li> <li>Correction</li> <li>Deletion</li> </ul>

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	<ul style="list-style-type: none"> <li>Opt-out of:               <ul style="list-style-type: none"> <li>Sale of personal data</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Non-Discrimination</li> <li>Opt-out of:               <ul style="list-style-type: none"> <li>Sale of personal data</li> </ul> </li> <li>Correct personal information</li> <li>Limit the use of sensitive personal information</li> </ul>	<ul style="list-style-type: none"> <li>Portability</li> <li>Opt-out of:               <ul style="list-style-type: none"> <li>Targeted advertising</li> <li>Sale of personal data</li> <li>Profiling in furtherance of decisions that produce legal/significant effects</li> </ul> </li> <li>Appeal</li> </ul>	<ul style="list-style-type: none"> <li>Portability</li> <li>Opt-out of:               <ul style="list-style-type: none"> <li>Targeted advertising</li> <li>Sale of personal data</li> <li>Profiling in furtherance of solely automated decisions that produce legal/significant effects</li> </ul> </li> <li>Appeal</li> </ul>	<ul style="list-style-type: none"> <li>Opt-out of:               <ul style="list-style-type: none"> <li>Targeted advertising</li> <li>Sale of personal data</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Portability</li> <li>Opt-out of:               <ul style="list-style-type: none"> <li>Targeted advertising</li> <li>Sale of personal data</li> <li>Profiling in furtherance of decisions that produce legal/significant effects</li> </ul> </li> <li>Appeal</li> </ul>
<b>Data Privacy Impact Assessments</b>	No requirement to conduct or document.	No requirement to conduct or document.*  *Pending regulations.	Controllers must conduct and document data protection assessments for the following activities: <ul style="list-style-type: none"> <li>Targeted advertising</li> </ul>	Controllers must conduct and document data protection assessments for the following activities: <ul style="list-style-type: none"> <li>Targeted advertising</li> <li>Sale of personal data</li> <li>Profiling</li> <li>Sensitive data</li> </ul>	No requirement to conduct or document.	Controllers must conduct and document data protection assessments for the following activities: <ul style="list-style-type: none"> <li>Targeted advertising</li> <li>Sale of personal data</li> <li>Profiling</li> <li>Sensitive data</li> </ul>

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			<ul style="list-style-type: none"> <li>• Sale of personal data</li> <li>• Profiling</li> <li>• Sensitive data</li> <li>• Catch-all: any data that presents a “heightened risk of harm to consumers.”</li> </ul>	Catch-all: any data that presents a “heightened risk of harm to consumers.”		<ul style="list-style-type: none"> <li>• Catch-all: any data that presents a “heightened risk of harm to consumers.”</li> </ul>
<b>Data Protection Authority</b>	California Office of the Attorney General	\$10 million allocated per year to the California Privacy Protection Agency (CPPA).  Primary enforcement and rulemaking abilities shift from the California Attorney General to the CPPA.	Colorado Office of the Attorney General and District Attorneys	Connecticut Office of the Attorney General	Utah Office of the Attorney General	Virginia Office of the Attorney General
<b>Cure Provision</b>	30 days to cure upon written notice of a	Ability to cure removed from CPRA.	[Until 1/1/2025:]	[Until 12/31/2024:]	30 days to cure upon written notice of a	30 days to cure upon written notice of a

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	violation by the California Attorney General's office.		60 days to cure upon written notice of a violation by Colorado Attorney General's office or District Attorney's office.	60 days to cure upon written notice of a violation by Connecticut Attorney General's office.  [After 1/1/2025:] Up to AG discretion.	violation by Utah Attorney General's office.	violation by Virginia Attorney General's office.
<b>Enforcement</b>	Administrative fines ranging from \$2,500 per violation to \$7,500 for intentional violations.	Administrative fines of up to \$7,500 now include intentional violations <i>and</i> children's data violations.	Administrative fines of \$20,000 per violation.	Administrative fines of up to \$5,000 per violation.	Administrative fines of up to \$7,500 per violation.	Administrative fines of up to \$7,500 per violation.
<b>Private Right of Action</b>	Consumers have a private right of action for the unauthorized disclosure of nonencrypted and nonredacted personal information.	Same as CCPA.	Consumers do NOT have a private right of action.	Consumers do NOT have a private right of action.	Consumers do NOT have a private right of action.	Consumers do NOT have a private right of action.