

Topic	California	Colorado	Connecticut	Utah	Virginia
<p>Applicability</p> <p><i>[Different thresholds for applicability.]</i></p>	<p>A for-profit “business” that does business in CA, meeting one of three thresholds:</p> <ol style="list-style-type: none"> 1. Annual revenues over \$25,000,000; 2. Collect personal information of over 100,000 consumers or households; 3. Generate at least half of revenues from sales of personal information. <p>Any entity that controls or is controlled by a business, as defined in the CCPA and that shares common branding with the business and with whom the business shares consumers’ personal information.</p> <p>A joint venture or partnership composed of businesses in which</p>	<p>Controller that conducts business in Colorado or produces or delivers commercial products or services that are intentionally targeted to residents of Colorado and:</p> <ol style="list-style-type: none"> 1. Controls or processes the personal data of 100,000 consumers or more during a calendar year; or 2. Derives revenue or receives a discount on the price of goods or services from the sale of personal data and processes or controls the personal data of 25,000 	<p>Persons that conduct business in Connecticut or produce products or services that are targeted to Connecticut residents and that:</p> <ol style="list-style-type: none"> 1. Control or process personal data of at least 100,000 consumers per year (not including a payment transaction); or Control or process personal data of at least 25,000 consumers and derive more than a quarter of gross revenues from the sale of personal data. 	<p>Controller or processor that conducts business in Utah or produces a product or services that is targeted to consumers who are residents of Utah and:</p> <ol style="list-style-type: none"> 1. Annual revenues over \$25,000,000; 2. Controls or processes the personal data of 100,000 consumers or more during a calendar year; or 3. Control or process personal data of at least 25,000 consumers and derive more than half of gross revenues from the sale of personal data. 	<p>Persons that conduct business in Virginia or produce products or services that are targeted to Virginia residents and that:</p> <ol style="list-style-type: none"> 1. Control or process personal data of at least 100,000 consumers per year; or 2. Control or process personal data of at least 25,000 consumers and derive more than half of gross revenues from the sale of personal data.

Topic	California	Colorado	Connecticut	Utah	Virginia
	<p>each business has at least a 40 percent interest. For purposes of this title, the joint venture or partnership and each business that composes the joint venture or partnership shall separately be considered a single business, except that personal information in the possession of each business and disclosed to the joint venture or partnership shall not be shared with the other business.</p>	<p>consumers or more.</p>			
<p>Personal Information or Personal Data <i>[Similar definitions]</i></p>	<p>Personal information is 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, not including publicly available information or de-identified or aggregate consumer information.</p>	<p>Personal data means information that is linked or reasonably linkable to an identified or identifiable individual, not including publicly available information.</p>	<p>Personal data means any information that is linked or reasonably linkable to an identified or identifiable individual. Personal data does not include de-identified data or publicly available information.</p>	<p>Personal data means information that is linked or reasonably linkable to an identified individual or identifiable individual. Personal data does not include de-identified data, aggregated data, or publicly available information.</p>	<p>Personal data means any information that is linked or reasonably linked to an identified or identifiable natural person, not including de-identified data or publicly available information.</p>

Topic	California	Colorado	Connecticut	Utah	Virginia
<p>Sensitive Information</p> <p><i>[Different definitions. CO, CT, UT, and VA track the GDPR; CA also includes information that could be used to commit fraud and identity theft.]</i></p>	<p>Sensitive personal information means (in-summary) personal information that reveals certain information about a consumer. The specific categories of sensitive personal information are listed in the statute and include data types similar to those listed in Virginia and Colorado, and information such as Social Security number, driver's license, state identification card or passport numbers, account log-in, financial account, debit card or credit card numbers in combination with any required security or access code, password or credentials allowing access to an account, and precise geolocation.</p>	<p>Sensitive data means personal data revealing racial or ethnic origin, religious beliefs, a mental or physical health condition or diagnosis, a person's sex life or sexual orientation, citizenship, or citizenship status, as well as genetic or biometric data that may be processed for the purpose of uniquely identifying an individual. The definition also includes personal data from a known child.</p>	<p>Sensitive data means personal data that includes: (A) data revealing racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life, sexual orientation or citizenship or immigration status; (B) the processing of genetic or biometric data for the purpose of uniquely identifying an individual; (C) personal data collected from a known child; or (D) precise geolocation data.</p>	<p>Sensitive data means: (i) personal data that reveals an individuals' racial or ethnic origin, an individual's religious beliefs, an individual's sexual orientation, an individual's citizenship or immigration status, or information regarding an individual's medical history, mental or physical health condition, or medical treatment or diagnosis by a health care professional; (ii) the processing of genetic personal data or biometric data, if such processing is for the purpose of identifying a specific individual; or (iii) specific geolocation data.</p>	<p>Sensitive data means a category of personal data that includes data revealing racial or ethnic origin, religious beliefs, physical or mental health diagnosis, sexual orientation, or citizen or immigrant status, as well as processing of genetic or biometric data for identification, precise geolocation data, and personal data collected from a known child.</p>
<p>Key Exemptions (non-exhaustive)</p>	<p><i>[Note: The Personnel and B2B exemptions in CA are scheduled to</i></p>	<p>1. Institutions subject to GLBA and its</p>	<p>1. Institutions subject to GLBA and its</p>	<p>1. Institutions subject to GLBA and its</p>	<p>1. Institutions subject to GLBA and its</p>

Topic	California	Colorado	Connecticut	Utah	Virginia
	<i>sunset January 1, 2023]</i> 1. Information (not institutions) subject to GLBA or California financial privacy laws 2. Institutions and information subject to HIPAA 3. Data regulated by FCRA, DPPA, FERPA and others 4. Non-profit organizations	implementing regulations 2. Institutions and information subject to HIPAA 3. Personnel data 4. B2B information 5. Data regulated by FCRA, DPPA, FERPA and others 6. Data maintained by state institutions of higher learning for non-commercial purposes	implementing regulations 2. Institutions and information subject to HIPAA 3. Personnel data 4. B2B information 5. Data regulated by FCRA, DPPA, FERPA and others 6. Non-profit organizations	implementing regulations 2. Institutions and information subject to HIPAA 3. Personnel data 4. B2B information 5. Data regulated by FCRA, DPPA, FERPA and others 6. Non-profit organizations	implementing regulations 2. Institutions and information subject to HIPAA 3. Personnel data 4. B2B information 5. Data regulated by FCRA, DPPA, FERPA and others 6. Non-profit organizations
	<i>Consumer Rights</i>				
Right of Access	Yes	Yes	Yes	Yes	Yes
Right of Portability	Yes	Yes	Yes	Yes	Yes
Right to Correct	Yes	Yes	Yes	Yes	Yes
Right to Delete	Yes	Yes	Yes	Yes	Yes
Opt-out Right (Ads / Selling)	Yes	Yes	Yes	Yes	Yes
Opt-in Right for processing Sensitive Data	No (Although may limit use and sharing)	Yes	Yes	Yes	Yes

Topic	California	Colorado	Connecticut	Utah	Virginia
Non-Discrimination Right (for exercising consumer rights)	Yes	No	Yes	Yes	Yes
Appeal Right	No	Yes	Yes	No	Yes
Private Right of Action	Yes	No	No	No	No
<i>Business/Controller Obligations</i>					
Notice to Consumers	Yes (Notice at Collection specifically required)	Yes	Yes	Yes	Yes
Privacy Policy	Yes (California Privacy Policy specifically required)	No (although required disclosures may be incorporated in privacy policy)	No (although required disclosures may be incorporated in privacy policy)	No (although required disclosures may be incorporated in privacy policy)	No (although required disclosures may be incorporated in privacy policy)
Contractual Requirements for Third Party Service Providers/Processors	Yes	Yes	Yes	Yes	Yes
Data Processing Impact Assessments (DPAs)	California-specific assessments required for processing and cybersecurity, no guidance yet available.	Yes	Yes	No	Yes
<i>Enforcement</i>					
Right to Cure	None (Note: existing right to cure sunsets January 1, 2023)	60 days	60 days	30 days	30 days
Enforcer	Dedicated enforcement agency (CPPA), Attorney General, and Private litigants	Attorney General and District Attorneys	Attorney General	Attorney General	Attorney General