

STATE LEGISLATION AT A GLANCE



LEGISLATIVE CRITERIA	CALIFORNIA PRIVACY RIGHTS ACT (CPRA)	VIRGINIA CONSUMER DATA PROTECTION ACT (VCDPA)	COLORADO PRIVACY ACT (CPA)	CONNECTICUT DATA PRIVACY ACT (CTDPA)	UTAH CONSUMER PRIVACY ACT (UCPA)
Effective Date	January 1, 2023*	January 1, 2023	July 1, 2023	July 1, 2023	December 31, 2023
Who's In Scope?	Businesses; Service Providers; Contractors; and Third parties; (Requires contracts between Businesses and others)	Controllers and Processors; (Requires contracts between Controllers and Processors)	Controllers and Processors; (Requires contracts between Controllers and Processors)	Controllers and Processors; (Requires contracts between Controllers and Processors)	Controllers and Processors; (Requires contracts between Controllers and Processors)
Scope Threshold	(1) Has annual gross revenues > \$25 mil; (2) Annually buys, sells, or shares personal information of 100,000 or more consumers or households; or (3) Derives 50% or more annual revenues from selling or sharing personal information	Control or process the personal data of: (1) at least 100,000 consumers in a calendar year or (2) at least 25,000 consumers and derive over 50 percent of gross revenue from the sale of personal data	Control or process the personal data of: (1) at least 100,000 consumers in a calendar year or (2) Derives revenue or receives a discount on the sale of personal data and processes or controls the personal data of 25,000 or more consumers	In the preceding calendar year, controlled or processed the personal data of (1) 100,000 or more consumers (excluding for payment transactions) or (2) at least 25,000 consumers and derived more than 25% of gross revenue from the sale of personal data	Has annual revenue of > \$25 mil. and control or process the personal data of: (1) at least 100,000 consumers in a calendar year or (2) at least 25,000 consumers and derive over 50 percent of gross revenue from the sale of personal data

*(12-month lookback period, but for personal information collected after 1/1/2022, consumers may request information beyond 12-month period)

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DATA INCLUSIONS & EXCLUSIONS

CALIFORNIA PRIVACY RIGHTS ACT (CPRA)

VIRGINIA CONSUMER DATA PROTECTION ACT (VCDPA)

COLORADO PRIVACY ACT (CPA)

CONNECTICUT DATA PRIVACY ACT (CTDPA)

UTAH CONSUMER PRIVACY ACT (UCPA)

Personal Information/Data Excludes De-Identified Data and Publicly Available Information



SENSITIVE INFORMATION INCLUSIONS

CALIFORNIA PRIVACY RIGHTS ACT (CPRA)

VIRGINIA CONSUMER DATA PROTECTION ACT (VCDPA)

COLORADO PRIVACY ACT (CPA)

CONNECTICUT DATA PRIVACY ACT (CTDPA)

UTAH CONSUMER PRIVACY ACT (UCPA)

Ethnic/Racial Origin, Mental/Physical Health Condition or Diagnosis, Sexual Orientation, Citizenship, Genetic/Biometric Information



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Known Child	⊗	✓	✓	✓	⊗
Geolocation	✓	✓	⊗	✓	✓
Email Contents	✓	⊗	⊗	⊗	⊗
Financial Information	✓	⊗	⊗	⊗	⊗
Social Security/Other ID	✓	⊗	⊗	⊗	⊗
Religious Beliefs	✓	✓	✓	✓	✓

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Consent Required to Process Sensitive Personal Information/Data	⊗	✓	✓	✓	⊗
Privacy Notice Required	✓	✓	✓	✓	✓
CONSUMER RIGHTS FOR PERSONAL INFORMATION/ DATA COLLECTED	CALIFORNIA PRIVACY RIGHTS ACT (CPRA)	VIRGINIA CONSUMER DATA PROTECTION ACT (VCDPA)	COLORADO PRIVACY ACT (CPA)	CONNECTICUT DATA PRIVACY ACT (CTDPA)	UTAH CONSUMER PRIVACY ACT (UCPA)
Access	✓	✓	✓	✓	✓
Deletion	✓	✓	✓	✓	✓
Correction	✓	✓	✓	✓	⊗

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<p>Opt- Out/Opt- In</p>	<p>Right to opt-out of sale or sharing of personal information Websites must include "Limit the Use of My Sensitive Personal Information" link in addition to "Do Not Sell or Share My Personal Information" link</p>	<p>Right to opt-out of sale of personal data, targeted advertising, and profiling</p>	<p>Right to opt-out of sale of personal data, targeted advertising, and profiling Contemplates a user-selected universal opt-out mechanism effective 7/1/2024</p>	<p>Right to opt-out of processing personal data for targeted advertising, the sale of personal data, or profiling Methods employed to allow consumers to exercise their rights must include a website link to a page that enables a consumer or agent to opt-out of targeted advertising or a sale of personal data*</p>	<p>Right to opt-out of sale of personal data and targeted advertising</p>
<p>Data Portability</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>
<p>Data Minimization</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>
<p>Non-Discrimination</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>	<p>✓</p>

*No later than 1/1/2025, Controllers must allow consumers to opt-out of targeted advertising or a sale of personal data through an opt-out preference signal sent, with a consumer's consent, by a platform, technology, or mechanism indicating the intent to opt-out





















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Authorized Agent Can Invoke Rights on Behalf of Consumer	✓	✗	✗	✓ Agent can invoke right to opt-out of a sale, targeted advertising, or profiling	✗
Parent Can Invoke Rights on Behalf of Child	✓	✓	✓	✓	✓
Parental Consent for Collection of Personal Information/Data from Children Under 13	✓ Parental consent is not required for the collection of personal information from children, but parental consent is required for the “sale” of personal information pertaining to children under 13, and teens under 16 must opt-in to a “sale” of their personal information	✓	✓	✓ Defers to COPPA	✓ Defers to COPPA
Recordkeeping	✓ At least 24 months	✗	✗	✗	✗

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<p>Written Contracts with Service Providers/Processors and Others Required</p>	<p> New defined term of "Contractor" and new requirements for contracts between Businesses and Contractors</p>	<p> Requires contracts between Controllers and Processors</p>	<p> Requires contracts between Controllers and Processors</p>	<p> Requires contracts between Controllers and Processors</p>	<p> Requires contracts between Controllers and Processors</p>
<p>Data Impact Assessments Required</p>	<p></p>	<p></p>	<p></p>	<p></p>	<p></p>
<p>Implement and Maintain Reasonable Administrative, Technical, and Physical Data Security Practices</p>	<p></p>	<p></p>	<p></p>	<p></p>	<p></p>
<p>Private Right of Action</p>	<p> Extends CCPA private right of action to breach of a username and password that permits access to an account</p>	<p></p>	<p></p>	<p></p>	<p></p>

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Enforcement	Creates new California Privacy Protection Agency (CPPA)	Attorney General	Attorney General, District Attorneys	Attorney General	Division of Consumer Protection will investigate and refer to Attorney General
Opportunity to Cure	Eliminates CCPA right to cure effective 1/1/2023	30 Days	60 days (expires 12/31/2024)	60 days (expires 12/31/2024, but within AG's discretion after such date)	30 Days

Reach out to hello@truyo.com with any questions