



PRIVACY LAW CHEAT SHEET

	California Consumer Privacy Act (CCPA) / California Privacy Rights Act (CPRA) ¹	Virginia Consumer Data Protection Act ²	Colorado Privacy Act ³	Utah Consumer Privacy Act ⁴	Connecticut Privacy Act ⁵
Key Dates	<p>The CCPA became law in 2018 and went into effect on January 1, 2020, with enforcement starting July 1, 2020.</p> <p>The CPRA was a ballot initiative (Prop. 24) which passed in November 2020. It goes into effect on January 1, 2023 with enforcement starting on July 1, 2023.</p>	<p>Signed on March 2, 2021. Effective on January 1, 2023.</p>	<p>Signed on July 7, 2021. Effective on July 1, 2023.</p>	<p>Signed on March 24, 2022 Effective on December 31, 2023</p>	<p>Signed on May 11, 2022 Effective July 1, 2023</p>

¹ California Civil Code [§ 1798.100 et seq](#)

² Virginia [HB 2307 / Ch. 35](#)

³Colorado [SB 190](#)

⁴ Utah [SB 227](#)

⁵ Connecticut [SB 6 / Act 22-15](#)

	California Consumer Privacy Act (CCPA) / California Privacy Rights Act (CPRA) ¹	Virginia Consumer Data Protection Act ²	Colorado Privacy Act ³	Utah Consumer Privacy Act ⁴	Connecticut Privacy Act ⁵
Applicability	Applies to businesses that: <ul style="list-style-type: none"> (A) Have annual gross revenues in excess of \$25 million as of January 2020, adjusted for inflation; (B) Alone or in combination, annually buys, sells, or shares the personal information of 100,000 or more consumers or households; or (C) Derive over 50 percent of gross revenue from selling or sharing consumers' personal information. 	Applies to businesses that: <ul style="list-style-type: none"> (A) Control or process personal data of 100,000 or more consumers; or (B) Control or process personal data of at least 25,000 consumers and derive over 50 percent of gross revenue from the sale of personal data. 	Applies to businesses that: <ul style="list-style-type: none"> (A) Control or process personal data of more than 100,000 consumers per calendar year; or (B) Derive revenue from the sale of personal data and control or process the personal data of at least 25,000 consumers. 	Applies to: Businesses that: <ul style="list-style-type: none"> (A) Have annual revenue of \$25 million or more (B) Satisfy one of the following: <ul style="list-style-type: none"> a. Control or process the personal data of 100,000 or more consumers in a calendar year; or b. Derive over 50% of their gross revenue from the sale of personal data and controls or processes the personal data of 25,000 or more consumers. 	Applies to businesses that: <ul style="list-style-type: none"> (A) Control or process data of at least 75,000 consumers, excluding personal data controlled or processed solely for the purpose of completing a payment transaction; or (B) Control or process the data of at least 25,000 consumers and derive more than 25 percent of their gross revenue from the sale of data.
Definition of Personal Information	Definition of personal information is very long and is contained in the California Civil Code § 1798.140 (v) (1) Does not include publicly available information, lawfully obtained, truthful information that is a matter of public concern, or deidentified or aggregate consumer information.	"Personal data" means any information that is linked or reasonably linkable to an identified or identifiable natural person. "Personal data" does not include de-identified data or publicly available information."	"Personal data" means 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."	"Personal data" means information that is linked or reasonably linkable to an identified individual or an identifiable individual. (b) "Personal data" does not include deidentified data, aggregated data, or publicly available information."	"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.

	California Consumer Privacy Act (CCPA) / California Privacy Rights Act (CPRA) ¹	Virginia Consumer Data Protection Act ²	Colorado Privacy Act ³	Utah Consumer Privacy Act ⁴	Connecticut Privacy Act ⁵
Definition of Consumer	"A natural person who is a California resident, as defined in Section 17014 of Title 18 of the California Code of Regulations, as that section read on September 1, 2017, however identified, including by any unique identifier."	"A natural person who is a resident of the Commonwealth acting only in an individual or household context. It does not include a natural person acting in a commercial or employment context."	"An individual who is a Colorado resident acting only in an individual or household context; and does not include an individual acting in a commercial or employment context."	"An individual who is a resident of the state acting in an individual or household context. (b) 'Consumer' does not include an individual acting in an employment or commercial context."	"An individual who is a resident of this state and who is acting only in an individual, noncommercial or household context."
Other Definitions	"Household" means a group, however identified, of consumers who cohabitate with one another at the same residential address and share use of common devices or services.				
Privacy Rights	Rights to delete, know, access, correct, opt out, limit use & disclosure of sensitive information, protection against discrimination. It also prohibits companies from retaliating against employees, job applicants, and contracts for exercising their rights.	Rights to access, correct, delete, obtain a copy of data, and opt out.	Right to opt-out, right to access, right to correction, right to deletion, and right to data portability.	Right to access, right to correction, right to deletion, right to access, right to opt-out.	Right to know, right to correct, right to delete, right to access, and right to opt-out.
Exemptions	Information covered by the GLBA Information and activities covered under the FCRA	Institutions and data subject to the GLBA Information and activities covered under the FCRA	Institutions subject to the GLBA and their affiliates. Activities regulated by the FCRA	Institutions subject to the GLBA and their affiliates. Activities regulated by the FCRA.	Data and institutions subject to the GLBA. Activities covered by the FCRA, and employee information.

© American Financial Services Association. Content is general information only, not legal advice or legal opinion based on any specific facts or circumstances. For your company's compliance, please seek legal advice. AFSA expressly disclaims any and all liability that may result from reliance on this document.

	California Consumer Privacy Act (CCPA) / California Privacy Rights Act (CPRA) ¹	Virginia Consumer Data Protection Act ²	Colorado Privacy Act ³	Utah Consumer Privacy Act ⁴	Connecticut Privacy Act ⁵
Enforcement	Attorney general California Privacy Protection Agency (starting July 1, 2023)	Attorney general	Attorney general	Enforced by the attorney general and Division of Consumer Protection in the Department of Commerce.	Enforced by the attorney general.
Private Right of Action	Private right of action for data breaches	No private right of action	Private right of action explicitly prohibited.	Private right of action explicitly prohibited.	Does not create a private right of action.