

	California	Virginia	Colorado	Utah	Connecticut
Scope	Applies to businesses that: Have \$25 million in annual gross revenue -OR- Process data of at least 100,000 consumers -or- Derive at least 50% of gross revenues from <i>selling or sharing</i> data	Applies to businesses that: Process data of at least 100,000 consumers -or- Process data of at least 25,000 consumers and derive at least 50% of gross revenues from <i>selling</i> data	Applies to businesses that: Process data of at least 100,000 consumers -or- Process data of at least 25,000 consumers and derive <i>revenue or receive a discount on goods or services</i> from <i>selling</i> personal data	Applies to businesses that: Have \$25 million in annual gross revenue -AND- Process data of at least 100,000 consumers -or- Process data of at least 25,000 consumers and derive at least 50% of gross revenues from <i>selling</i> personal data	Applies to businesses that: Process data of at least 100,000 consumers (excluding purely payment transactions) -or- Process data of at least 25,000 consumers and derive at least 50% of gross revenues from <i>selling</i> personal data
Effective Date	Jan. 1, 2023	Jan. 1, 2023	July 1, 2023	Dec. 31, 2023	July 1, 2023
Definition of Sale	Money or other valuable consideration	Money	Money or other valuable consideration	Money	Money or other valuable consideration
Definition of Personal Data	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 Excludes de-identified or publicly available data Publicly available data is information that is lawfully available from government records	Information that is linked or reasonably linkable to an identifiable natural person Excludes de-identified or publicly available data Publicly available data is information that is lawfully available from government records or information that a controller reasonably believes the consumer has lawfully made available to the general public	Information that is linked or reasonably linkable to an identifiable individual Excludes de-identified or publicly available data Publicly available data is information that is lawfully available from government records or information that a controller reasonably believes the consumer has lawfully made available to the general public	A first name or first initial and last name, combined with any one or more of the following (only if unencrypted): Social Security number (SSN); financial account number AND any related security code or password; driver's license (DL) or state ID number. Excludes de-identified or publicly available data Publicly available data is information that is lawfully available from government records or information that a controller reasonably believes the consumer or <i>widely distributed media</i> has lawfully made available to the general public	Information that is linked or reasonably linkable to an identifiable individual Excludes de-identified or publicly available data Publicly available data is information that is lawfully available from government records or information that a controller reasonably believes the consumer has lawfully made available to the general public
Sensitive Data	Includes: race or ethnicity; religion; health; sexual orientation; citizenship; genetic data; biometric data used to identify a person; precise geolocation; union membership; SSN; DL or passport number; financial account with password or security code; and contents of mail, email or texts (unless a business is the intended recipient) Processor must self-restrict to certain uses, or provide notice and opportunity to opt out	Includes: race or ethnicity; religion; health; sexual orientation; citizenship; genetic or biometric data used to identify a person; precise geolocation; and personal data of children Processor needs consent to process	Includes: race or ethnicity; religion; health; sexual orientation; citizenship; genetic or biometric data used to identify a person; and personal data of children Processor needs consent to process	Includes: race or ethnicity; religion; health; sexual orientation; citizenship; genetic or biometric data used to identify a person; and precise geolocation Processor must present notice and opportunity to opt out	Includes: race or ethnicity; religion; health; sexual orientation; citizenship; genetic or biometric data used to identify a person; precise geolocation; and personal data of children Processor needs consent to process
Notable Exceptions	HIPAA data GLBA data Nonprofits Higher education FCRA	HIPAA entities GLBA entities Nonprofits Higher education FCRA Employment data Commercial B2B data	HIPAA data GLBA entities Higher education FCRA Employment data Commercial B2B data National securities associations	HIPAA entities GLBA entities Nonprofits Higher education FCRA Employment data Commercial B2B data	HIPAA entities GLBA entities Nonprofits Higher education FCRA Employment data Commercial B2B data National securities associations
Notable Consumer Rights	Right to access Right to correct Right to delete Right to portability Right to opt out of sale or <i>sharing</i> Right to nondiscrimination Right to notice at or before collection	Right to access Right to correct Right to delete Right to portability Right to opt out of sale, <i>profiling or targeted ads</i> Right to nondiscrimination Right to appeal	Right to access Right to correct Right to delete Right to portability Right to opt out of sale, <i>profiling or targeted ads</i> Right to appeal <i>Rather than a right to nondiscrimination, Colorado imposes a duty on controllers not to violate existing laws against discrimination</i>	Right to access Right to delete Right to portability Right to opt out of sale or <i>targeted ads</i> Right to nondiscrimination	Right to access Right to correct Right to delete Right to portability Right to opt out of sale, <i>profiling or targeted ads</i> Right to appeal <i>Rather than a right to nondiscrimination, Connecticut imposes a duty on controllers not to violate existing laws against discrimination</i>
Controller Duties	Transparency Purpose specification Data minimization Data security/care Nondiscrimination Sensitive data caution Avoid secondary use Pass requests-to-delete on to third parties	Transparency Purpose specification Data minimization Data security/care Nondiscrimination Sensitive data consent Avoid secondary use	Transparency Purpose specification Data minimization Data security/care Nondiscrimination Sensitive data consent Avoid secondary use	Transparency Purpose specification Data minimization Data security/care Nondiscrimination Sensitive data caution	Transparency Purpose specification Data minimization Data security/care Nondiscrimination Sensitive data consent Avoid secondary use
Privacy Notice Requirements	Categories of data Purpose for processing each category How to exercise consumer rights Categories of data shared with third parties Categories of third parties with whom data is shared Any sale of data and how to opt out Clear and conspicuous link to opt out of sale on <i>homepage</i> Duration of retention of each data category Notice to consumers of their CPRA rights Categories of sources of data Categories of sensitive personal data, including any extraneous use and the consumer's right to opt out	Categories of data Purpose for processing each category How to exercise consumer rights Categories of data shared with third parties Categories of third parties with whom data is shared Any sale of data or <i>targeted advertising</i> and how to opt out Categories of sources of data	Categories of data Purpose for processing each category How to exercise consumer rights Categories of data shared with third parties Categories of third parties with whom data is shared Any sale of data and how to opt out Categories of sources of data	Categories of data Purpose for processing each category How to exercise consumer rights Categories of data shared with third parties Categories of third parties with whom data is shared Any sale of data or <i>targeted advertising</i> and how to opt out	Categories of data Purpose for processing How to exercise consumer rights and appeal Categories of data shared with third parties Categories of third parties with whom data is shared Any sale of data or <i>targeted advertising</i> Clear and conspicuous link to a webpage for opting out of sale or targeted advertising Active email address for how to contact the controller
Timing to Respond	45 days, with an additional 45 days when reasonably necessary 15 days for opt-out requests	45 days, with an additional 45 days when reasonably necessary	45 days, with an additional 45 days when reasonably necessary	45 days, with an additional 45 days when reasonably necessary	45 days, with an additional 45 days when reasonably necessary
Right to Appeal	No	Yes; 60 days to respond	Yes; 45 days to respond	No	Yes; 60 days to respond
Private Right of Action and Fines	Yes; up to a \$750 fine per consumer per incident, or actual damages	No; attorney general (AG) can impose up to a \$7,500 fine per violation	No; violation is a "deceptive trade practice" under the Colorado Consumer Protection Act, which carries up to a \$20,000 fine per violation	No; AG can impose up to a \$7,500 fine per violation	No; AG can impose up to a \$5,000 fine per willful violation
Required Terms in Data Processing Agreements	Limited and Specific Processing Instructions Obligate the service provider to comply with the CPRA Assist Controller with Auditing and Complying Allows Controller to Halt and Remediate Improper Processing Notice to Controller if Processor Can't Comply	Processing Instructions Purpose of Processing Type of Data Processed Duration of Processing Rights and Obligations of Both Parties Confidentiality Duties Duties to Return or Delete Data Assist Controller with Auditing and Complying	Processing Instructions Purpose of Processing Type of Data Processed Duration of Processing Rights and Obligations of Both Parties Confidentiality Duties Duties to Return or Delete Data Assist Controller with Auditing and Complying	Processing Instructions Purpose of Processing Type of Data Processed Duration of Processing Rights and Obligations of Both Parties Confidentiality Duties Ensure Subcontractors Comply, in Writing	Processing Instructions Purpose of Processing Type of Data Processed Duration of Processing Rights and Obligations of Both Parties Confidentiality Duties Duties to Return or Delete Data Assist Controller with Auditing and Complying Ensure Subcontractors Comply, in Writing
Data Processing Impact Assessments	Required when: Processing sensitive data Data presents significant consumer risk The risks of processing outweigh the consumer benefits	Required when: Processing sensitive data Data presents a heightened risk of harm Data is used for targeted advertising Data is for sale Data is used for profiling when it creates harm; unfair, deceptive or disparate treatment; or an offensive intrusion on the solitude or private affairs of consumers	Required when: Processing sensitive data Data presents a heightened risk of harm Data is used for targeted advertising Data is for sale Data is used for profiling when it creates harm; unfair, deceptive or disparate treatment; or an offensive intrusion on the solitude or private affairs of consumers	Not required	Required when: Processing sensitive data Data presents a heightened risk of harm Data is used for targeted advertising Data is for sale Data is used for profiling when it creates harm; unfair, deceptive or disparate treatment; or an offensive intrusion on the solitude or private affairs of consumers
Safe Harbor Period	None	30-day cure period	60-day cure period, ends January 1, 2025	30-day cure period	60-day cure period, ends January 1, 2025