

**DATA PRIVACY, PIRACY AND CONSPIRACY: NEW INTERNATIONAL
DATA REGULATIONS CAN IMPOSE DIRE CONSEQUENCES
ON THE UNPREPARED**

**INTERNATIONAL ASSOCIATION OF DEFENSE COUNSEL
2023 ANNUAL MEETING**

By: Professor Marcia Narine-Weldon
mweldon@law.miami.edu

Walt Green
walt.green@phelps.com

Brent Arnold
brent.arnold@gowlingwlq.com

I. Cybersecurity and Data Privacy

Cybersecurity laws and privacy laws are interrelated, but not synonymous. In general, *privacy* laws govern the collection, retention and use of personally identifiable information. Most of these laws include a general duty to protect such information from third parties, but are neither prescriptive nor detailed. *Cybersecurity* laws, by contrast, impose specific obligations on entities with respect to cyber-attack preparedness and reporting to regulatory authorities. In the United States, the federal government and several local governments have already implemented such laws. Many jurisdictions have had privacy laws in place for decades, and in some jurisdictions, a new generation of privacy laws is emerging to replace outdated laws. The United States has yet to adopt a comprehensive federal privacy law, but in recent years several states, following California's lead, have passed robust laws governing data privacy (these are discussed further below). The European Union has had an EU-wide law in place for several years now (the [GDPR](#), also discussed further below), Canada has had a federal law in place governing commercial collection of data since 2000 (known colloquially as [PIPEDA](#)), soon to be replaced by a more robust and comprehensive GDPR-style law ([Bill C-27](#), currently working its way through Parliament). China, for its part, recently implemented a comprehensive and strict new privacy law of its own (known as [PIPL](#)).

Privacy laws in many jurisdictions are based on a common core of principles set out in a [framework developed by the Organization for Economic Co-operation and Development](#).

The framework sets out the following principles:

1. **Collection Limitation Principle:** The collection of personal data should be limited, and should be obtained “by lawful and fair means and, where appropriate, with the knowledge or consent of the data subject.”

2. **Data Quality Principle:** Personal information should be relevant to the purposes for which it is to be used, and should be accurate, complete and up-to-date.
3. **Purpose Specification Principle:** Data should be collected for purposes specified at the time of collection (at the latest). Subsequent new uses should be limited to those purposes.
4. **Use Limitation Principle:** Personal data shouldn't be disclosed, shared or used for purposes other than those specified purposes, except where consent is obtained, or by the authority of law.
5. **Security Safeguards Principle:** Personal data should be protected by "reasonable security safeguards against such risks as loss or unauthorised access, destruction, use, modification or disclosure of data" (this is the element of laws based on the OECD framework that overlaps with cybersecurity).
6. **Openness Principle:** Persons whose data has been collected should be able to obtain information about an organization's data collection practices and policies without unreasonable effort.
7. **Individual Participation Principle:** Individuals should have the right to obtain data collected about them by an organization, and to challenge data collected relating to them.
8. **Accountability Principle:** A data controller should be accountable for complying with measures that give effect to the above principles.

A core element of most privacy laws is an obligation to give notice to data subjects and to report to privacy regulators in the event of an incident leads to the inadvertent disclosure of data subjects' personal information. Generally speaking, a threshold test must be met to invoke these obligations, typically along the lines of a real risk that significant harm may occur to the data subject as a result of the incident.

Cybersecurity laws, in those jurisdictions that have them, are relatively new (see for example the incoming Canadian federal [Bill C-26](#), currently working its way through Parliament). These often focus on critical infrastructure and impose positive, specific obligations to put measures in place to ensure organizations make plans and take appropriate steps to secure themselves from cyber attacks. For instance, Canada's [draft federal law](#) applies to organizations in the following sectors:

- Telecommunications services

- Interprovincial or international pipeline and power line systems
- Nuclear energy systems
- Transportation systems that are within the legislative authority of Parliament
- Banking systems
- Clearing and settlement systems

The bill requires every designated organization in one of the sectors to devise a cybersecurity program to:

- (a) identify and manage any organizational cyber security risks, including risks associated with the designated operator's supply chain and its use of third-party products and services;
- (b) protect its critical cyber systems from being compromised;
- (c) detect any cyber security incidents affecting, or having the potential to affect, its critical cyber systems; and
- (d) minimize the impact of cyber security incidents affecting critical cyber systems; and

The state of New York, for example, imposes similar obligations on financial institutions. Current U.S. cybersecurity laws focus on the sharing of threat information between companies and the U.S. government, and facilitating public-private partnerships to improve cybersecurity in the private sector.

II. The Cybersecurity Threat Landscape

Over the last several years the threat landscape has not changed drastically. Although the landscape remains relatively stable, the techniques that criminals utilize are ever evolving. As the 2022 Annual IBM Cost of a Data Breach Report indicated, the average cost for a data breach in the United States was \$9.44M which is more than twice the global cost of a data breach of \$4.35M (<https://www.ibm.com/reports/data-breach>). The Federal Bureau of Investigation ("FBI") continues to warn consumers and businesses of common internet crimes (<https://www.fbi.gov/investigate/cyber>), such as business email compromise, identity theft, spoofing and phishing, and ransomware. And yet, there

is some good news concerning ransomware; ransomware payments were down 40% in 2022. According to **Chainalysis** (<https://blog.chainalysis.com/reports/crypto-ransomware-revenue-down-as-victims-refuse-to-pay/>), a blockchain data platform, ransomware payments declined from an all-time high of \$766 million in 2021 to \$457 million in 2022. Similarly, Delina, a Privileged Access Management provider, reported in its **2022 State of Ransomware Report** (<https://delinea.com/news/2022-state-of-ransomware-report>) that ransomware attacks in 2022 were down 61% from 2021. While these numbers are encouraging, this is no time to lower your business' defenses or put off having a robust cyber protection plan.

Ultimately, the main reason for the reduction in ransomware payments is because more and more businesses are refusing to become victims of extortion due to their investment in cyber hygiene and defenses. With business strategies that incorporate more sophisticated backups and recovery tools to thwart the effects of ransomware, well-equipped companies can recover much more quickly and reduce the costs of a ransomware attack. Likewise, as encryption and anonymization become more prevalent, it significantly lessens the value of any data—making it virtually worthless— that cybercriminals may obtain. Another factor affecting ransomware payments may be that the U.S. Department of Treasury's Office of Foreign Assets is adding more cybercriminal organizations to its sanctions list. Critically, any business that pays ransomware to a prohibited organization on the sanctions list could face severe monetary penalties. And then there is the demise of the Conti ransomware group. At its height, Conti was one of the largest ransomware groups in the world. However, after publicly supporting Russia in the Russia-Ukraine war, a Conti insider who disagreed with this stance published tens

of thousands of pages of their day-to-day operations. This disclosure included their ransomware code. Ransomware payments to the organization collapsed in a matter of months after Conti announced it openly supported Russia in the war.

While ransomware payments and attacks declined in 2022, there is no guarantee that this trend will continue in 2023. Businesses should remain vigilant. Cybercriminals will continue to attempt to circumvent our most sophisticated defense tools, and cybercriminal organizations when faced with their own demise may simply reinvent themselves or have members who move onto other cybercriminal groups. Having strong protections in place is still critical for businesses to prevent cyberattacks, and, in the unfortunate event a cyberattack occurs, to recover with as little loss and cost as possible.

III. International Privacy Laws

GDPR/PIPL/LGDP

In 2016, the European Union General Data Protection Regulation (“GDPR”) introduced groundbreaking consumer data protections for all members of the European Union. The GDPR framework has influenced other major pieces of privacy legislation across the world. Two of these laws include China’s 2021 Personal Information Protection Law (PIPL) and Brazil’s 2020 Lei Geral de Protecao de Dados or the General Law on the Protection of Personal Data (“LGPD”). All three of these important pieces of legislation contain several of the same or similar provisions:

- Grant Extraterritorial Jurisdiction
- Define Personal Information
- Provide Legal Basis for Processing Personal Information
- Require Data Protection Impact Assessment

- Detail Cross Border Data Transfer Obligations
- Provide for Supervisory Regulatory Authorities
- Allow for Stringent Penalties for Violations

Considering that the combined population of the European Union, China, and Brazil is over two billion persons, these laws and regulations cannot be ignored by companies with a global or international footprint. Because companies or clients may operate under one or more of these jurisdictions, careful consideration must be given to the similarities and differences of these laws to avoid running afoul of the supervisory regulatory authorities in their respective countries.

IV. California Privacy Laws

CCPA/CPRA

The California Consumer Privacy Act of 2018 (“CCPA”) was amended by the California Privacy Rights Act of 2020 (“CPRA”). These two acts remain the foremost pieces of consumer privacy legislation in the United States, and are enforced by the California Privacy Protection Agency. Notably, the CCPA was the first privacy law of its kind in this country by providing consumers with the right to access, delete, correct, opt-out of direct marketing, among others. Additional states—including Virginia, Utah, Connecticut, and Colorado—have since followed suit by providing more consumer rights concerning personal data. Unlike the GDPR, PIPL and LGPD, the United States does not have a national data privacy law—yet. The introduction of a Congressional bill in 2022 for the American Data Privacy and Protection Act (“ADDPA”) shows that momentum is growing here for a national data privacy law. Although the ADDPA did not receive a vote in

Congress last year, the bill did receive some bi-partisan support and may provide a blueprint for this year's 118th Congress.

(<https://crsreports.congress.gov/product/pdf/LSB/LSB10776>)

The cornerstones of the bill were:

- Coverage applies to data that “identifies or is linked or reasonably linkable to an individual.
- Prohibition of entities from collecting, using or transferring data beyond what is necessary or proportionate to the service requested by a consumer.
- Provides consumer rights to include access, correction and deletion.

With states the global movement towards greater data protections and individual U.S. state laws passing their own respective pieces of state legislation, the question is not if there will be a national data privacy law, but when.

V. APPENDIX: Links to Current Federal and U.S. State Laws

Federal Laws

Federal Trade Commission Act

FTC Resources

https://consumer.ftc.gov/features/pass-it-on/resources	Several presentations detailed unfair acts and practices.
https://consumer.ftc.gov/features	Feature Articles by the FTC.
https://www.ftc.gov/business-guidance/resources	FTC guidance documents.
https://www.ftc.gov/about-ftc/contact	A detailed list of FTC contacts.
https://www.ftc.gov/business-guidance/small-businesses	Guidance documents that are relevant to small businesses.

Children's Online Privacy Protection Act (COPPA)

FTC COPPA Resources

https://www.ftc.gov/business-guidance/resources/complying-coppa-frequently-asked-questions	FAQ for complying with COPPA.
https://www.ftc.gov/about-ftc/contact	A detailed list of FTC contacts.
https://www.ftc.gov/business-guidance/privacy-security/childrens-privacy	FTC COPPA resources.

Fair Credit Reporting Act (FCRA)

https://www.consumerfinance.gov/compliance/compliance-resources/other-applicable-requirements/fair-credit-reporting-act/model-forms-and-disclosures/	CFBP Model Forms and Notices.
https://www.ftc.gov/business-guidance/privacy-security/credit-reporting	FTC's detailed business guidance webpage.
https://www.consumerfinance.gov/about-us/contact-us/	CFBP Contacts.
https://www.ftc.gov/about-ftc/contact	A detailed list of FTC contacts.

Industry-Specific Federal Laws

Gramm-Leach-Bliley Act (Financial Institutions)

Administered by the FTC. Regulates the collection, use, protection, and disclosure of nonpublic personal information (NPI) by financial institutions.

https://www.ftc.gov/business-guidance/privacy-security/gramm-leach-bliley-act	FTC's detailed business guidance webpage.
https://www.ftc.gov/business-guidance/resources/how-comply-privacy-consumer-financial-information-rule-gramm-leach-bliley-act	FTC's compliance GLBA guideline.
https://iapp.org/resources/article/guide-to-the-gramm-leach-bliley-act/	IAPP's GLBA guide.
https://www.consumerfinance.gov/compliance/compliance-resources/other-applicable-requirements/privacy-notice/	CFPB's GLBA privacy notices.
https://www.ftc.gov/about-ftc/contact	A detailed list of FTC contacts.

Health Insurance Portability And Accountability Act (HIPAA) (health care)

Administered by the Office for Civil Rights (OCR), which is part of the Department of Health and Human Services. Created to protect sensitive patient health information from being disclosed without the patient's consent or knowledge.

https://www.hhs.gov/hipaa/for-professionals/compliance-enforcement/index.html	HHS website to research HIPAA enforcement (process, past enforcement actions and resolutions, etc.) and to submit a HIPAA claim. OCR contact information is at the bottom of the page.
https://www.hhs.gov/hipaa/for-professionals/training/index.html	HHS HIPAA training resources
https://www.aha.org/websites/2017-12-01-hipaa-resource-links	The American Hospital Association's list of relevant organizations.

Health Information Technology for Economic and Clinical Health Act (HITECH Act)

An amendment to HIPAA meant to promote the adoption and meaningful use of health information technology.

https://www.hipaajournal.com/what-is-the-hitech-act/	HIPAA journal explanation
---	---------------------------

	of the HITECH Act.
https://wayback.archive-it.org/3926/20131018161347/http://www.hhs.gov/news/press/2009pres/10/20091030a.html	HHS HITECH press release.

Activity-Specific Federal Law

Telephone Consumer Protection Act (TCPA) (telemarketing)

Administered by Federal communications Commission (FCC). Enacted to amend the Communications Act of 1934, and meant to address telephone marketing calls and certain telemarketing practices.

https://www.fcc.gov/general/telemarketing-and-robocalls	FCC's general information about the TCPA.
https://www.fcc.gov/sites/default/files/tcpa-rules.pdf	Summary of the TCPA rules.
https://www.donotcall.gov/	FCC's national do not call registry. ¹
https://www.fcc.gov/about/contact	FCC's contact information.

Controlling the Assault of Non-Solicited Pornography and Marketing Act (CAN-SPAM Act) (commercial email)

Administered by the FTC and granting the FCC some rule making authority. Bans false or misleading header information and prohibits deceptive subject lines.

https://www.fcc.gov/consumers/guides/stop-unwanted-robocalls-and-texts	FCC Fact Sheet.
https://www.ftc.gov/business-guidance/resources/can-spam-act-compliance-guide-business	FTC Business Guidance.
https://www.fdic.gov/resources/supervision-and-examinations/consumer-compliance-examination-manual/documents/8/viii-4-1.pdf	FDIC Summary of CAN-SPAM.

Major State Privacy Laws

California Consumer Privacy Act (CCPA) & California Privacy Rights Act (CPRA) Amendment

The CCPA grants California residents rights regarding their personal information and imposes various data protection duties on certain entities conducting business in California.

https://oag.ca.gov/privacy/ccpa	California Office of the Attorney General (CA OAG) summary and FAQ.
---	---

¹ Doesn't actually deter spam calls.

https://oag.ca.gov/privacy/ccpa/enforcement	CA OAG recent enforcements.
https://oag.ca.gov/privacy/ccpa/icons-download	CA OAG opt-out icon.
https://oag.ca.gov/contact	CA OAG contact.
https://iapp.org/resources/topics/ccpa-and-cpra/	IAPP resources.
https://oag.ca.gov/privacy/databreach/reporting	California data breach notification guide

Colorado Privacy Act (CPA)

https://coag.gov/resources/colorado-privacy-act/	Colorado Attorney General (CAG) summary.
https://complaints.coag.gov/s/contact-us	CAG contact.
https://leg.colorado.gov/bills/sb21-190	Additional CAG summary.
https://iapp.org/news/a/colorado-privacy-act-becomes-law/	IAPP summary.
https://coag.gov/resources/data-protection-laws/	Colorado data breach notification guide

Virginia's Consumer Data Protection Act

https://iapp.org/news/a/virginia-passes-the-consumer-data-protection-act/	IAPP summary.
https://www.oag.state.va.us/consumer-protection/files/tips-and-info/Virginia-Consumer-Data-Protection-Act-Summary-2-2-23.pdf	Virginia Office of Attorney General (VOAG) summary with contact information.
VA Data Breach	Virginia data breach notification guide

Utah Consumer Privacy Act

https://iapp.org/news/a/utah-becomes-fourth-state-to-enact-comprehensive-consumer-privacy-legislation/	IAPP summary.
https://attorneygeneral.utah.gov/contact/	Utah Attorney General Contact
https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/utah	Insureon data breach notification summary

Connecticut Data Privacy Act

The Connecticut Data Privacy Act.	Connecticut Attorney General resource page.
https://portal.ct.gov/AG/Contact-the-Attorney-Generals-Office/Contact-the-Attorney-Generals-Office	Connecticut Attorney General contact.
https://iapp.org/news/a/connecticut-enacts-comprehensive-consumer-data-privacy-law/	IAAP summary.
CN Data Breach.	Connecticut data breach notification guide

Nevada Privacy Law

https://iapp.org/resources/article/nevada-privacy-law-compliance-guide/	IAPP summary.
https://ag.nv.gov/Contact/	Nevada Attorney General contact.

https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/nevada	Insureon data breach notification summary
---	---

State Privacy Laws

Alabama Data Breach Notification Act of 2018

621: DATA BREACH NOTIFICATION.	Summary of Alabama's privacy law
https://www.alabamaag.gov/generalcontact	Alabama Attorney General Contact form
https://iapp.org/news/a/alabama-closing-in-on-state-data-breach-notification-law/	IAPP article about Alabama's privacy law

Alaska Personal Information Protection Act

https://law.alaska.gov/departments/civil/consumer/4548.html	Summary of Alaska's privacy law
https://law.alaska.gov/departments/about.html	Alaska Attorney General contact page
https://iapp.org/news/a/privacy-bill-advances-in-alaska-introduced-in-wisconsin/	IAPP article about Alaska's privacy law

The Arkansas Personal Information Protection Act

The Arkansas Personal Information Protection Act.	Summary of Arkansas' privacy law
https://arkansasag.gov/resources/contact-us/	Arkansas Attorney General contact page
https://arkansasag.gov/consumer-protection/identity/security-or-data-breach/	Arkansas security or data breach guide

Delaware Online and Personal Privacy Act (DOPPA) and Data Breach laws

Security Breach Notification	Security breach notification guidance.
https://www.termsfeed.com/blog/doppa/	DOPPA summary
https://attorneygeneral.delaware.gov/contact/	Delaware Attorney General contact

Washington D.C. Data Breach Notification Law

https://oag.dc.gov/about-oag/laws-legal-opinions/requirements-districts-data-breach-notification	Data Breach Notification Law summary
https://oag.dc.gov/about-oag/contact-us	D.C. Attorney General contact

Florida Consumer Data Privacy Law

Overview of Florida Privacy Laws Affecting Information Sharing.	Florida Privacy Laws Affecting Information Sharing presentation
https://www.flsenate.gov/Session/Bill/2022/1864	Consumer Data Privacy summary

https://www.myfloridalegal.com/contact	Florida Attorney General contact
---	----------------------------------

Georgia

https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/georgia	Insureon data breach summary
GA AG	Georgia Attorney General contact page

Hawaii Data Breach Law

https://iapp.org/news/a/hawaii-legislature-considers-privacy-bills/	IAPP article on a proposed privacy bill
https://www.dataguidance.com/notes/hawaii-sectoral-privacy-overview	Summary of Hawaii's privacy laws
https://ag.hawaii.gov/contact-us/	Hawaii Attorney General contact page

Idaho Personal Information Act

Idaho Privacy Law Summary	Personal Information Protection Act summary
https://www.ag.idaho.gov/contact/	Idaho Attorney General contact page

Indiana Privacy Law

INDIANA DATA PROTECTION LAWS FAQ.	Indiana University data protection law summary and FAQ
https://www.in.gov/attorneygeneral/contact-us/	Indiana Attorney General contact page
https://www.in.gov/attorneygeneral/consumer-protection-division/id-theft-prevention/	Indiana AG data privacy page

Iowa Data Privacy Law (New)

Forbes Article	Forbes article on new privacy law
https://iapp.org/news/a/iowa-set-to-finalize-sixth-us-comprehensive-state-privacy-law/	IAPP article on new privacy law
https://www.jdsupra.com/legalnews/iowa-latest-state-to-pass-consumer-4272835/	JDSupra employer summary of new privacy law
https://www.iowaattorneygeneral.gov/contact-us	Iowa Attorney General contact page

Kansas Data Breach Law

https://ag.ks.gov/in-your-corner-kansas/your-identity/how-can-i-guard-against-a-data-breach	Kansas data breach law guide and summary
https://ag.ks.gov/about-the-office/contact-us/email-us	Kansas Attorney General contact page

Louisiana Data Breach Notification Law

https://grok.lsu.edu/article.aspx?articleid=17089	LSU Data Breach Notification Law summary
http://www.ag.state.la.us/Contact	Louisiana Attorney General contact page

Maine Privacy Law

https://iapp.org/resources/article/maine-privacy-law-guide/	IAPP Maine privacy law guide
https://www.maine.gov/governor/mills/news/governor-mills-signs-internet-privacy-legislation-2019-06-06	Maine press release of “An Act To Protect the Privacy of Online Customer Information.”
https://www.maine.gov/ag/contact.html	Maine Attorney General contact page

Maryland Personal Information Protection Act

Guidelines for Businesses	Guideline to comply with Maryland’s Personal Information Protection Act
AG Contact	Maryland Attorney General contact
https://iapp.org/news/a/maryland-enacts-personal-information-protection-act/	IAPP summary

Massachusetts Data Breach Law

https://www.mass.gov/doc/frequently-asked-questions-regarding-data-breach-notifications-and-changes-to-the-data-breach-notification-law-mgl-chapter-93h/download	MA. Data breach law FAQ
https://www.mass.gov/info-details/massachusetts-law-about-privacy	List of resources of MA. Data privacy and privacy laws
https://it.tufts.edu/about/policies-and-guidelines/guide-massachusetts-data-privacy-laws	Tuft University guide to MA. Privacy law
https://www.mass.gov/contact-the-attorney-generals-office	MA. Attorney General contact

Michigan Data Breach Law

https://www.michigan.gov/ag/consumer-protection/consumer-alerts/consumer-alerts/id-theft-telemarketing/data-breaches	Michigan data breach law summary
AG Contact.	Michigan Attorney General contact

Minnesota Privacy Laws

https://iapp.org/news/a/minnesota-passes-student-privacy-bill/	Minnesota student privacy bill IAPP summary
Data Breach	Minnesota data breach law guide
https://www.ag.state.mn.us/Office/ContactUs.asp	Minnesota Attorney General contact page

Mississippi Data Breach Law

Insureon Data Breach	Data breach law summary
https://www.ago.state.ms.us/contact/	Mississippi Attorney General contact page

Missouri Privacy Law

https://ago.mo.gov/civil-division/consumer/identity-theft-data-security/data-breaches	Missouri data breach law guide
https://ago.mo.gov/about-us/contact-us	Missouri Attorney General contact page

Montana Data Breach Law

https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/montana	Insureon Montana data breach law summary
https://directory.mt.gov/govt/state-dir/agency/justice	Montana Attorney General contact page

Nebraska Data Breach Law

https://protectthegoodlife.nebraska.gov/data-breach-notification	Nebraska data breach law guide
https://ago.nebraska.gov/contact-us	Nebraska Attorney General contact page

New Hampshire Data Breach Law

https://www.doj.nh.gov/consumer/security-breaches/	New Hampshire data breach guide
https://www.doj.nh.gov/contact/index.htm	New Hampshire Attorney General contact

New Jersey Data Breach Law

https://www.fisherphillips.com/privacy-legislation-state-map/new-jersey-privacy-legislation.html	NJ data privacy laws summary
NJ AG	NJ Attorney General contact page

New Mexico Data Breach Law

https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/new-mexico	Insureon data breach law guide
https://www.nmag.gov/	New Mexico Attorney General contact page

New York Data Breach Law

https://its.ny.gov/breach-notification-and-incident-reporting	New York data breach law guide
https://ag.ny.gov/public-integrity/contact	New York Attorney General contact page
https://ag.ny.gov/internet/data-breach	New York data breach law amendment summary

North Carolina Data Breach Law

UNC Guide	UNC data breach guide
https://ncdoj.gov/protecting-consumers/protecting-your-identity/protect-your-business-from-id-theft/security-breach-information/	North Carolina data breach law guide
Attorney General Contact.	North Carolina Attorney General contact page

North Dakota Data Breach Law

https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/north-dakota	Insureon data breach law summary
North Dakota AG.	North Dakota Attorney General contact

Ohio Data Breach Law

Data Breach	Ohio Data Breach guide
https://www.ohioattorneygeneral.gov/About-AG/Contact	Ohio Attorney General contact page

Oklahoma Consumer Data Privacy Law

https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/oklahoma	Insureon data breach law summary
Telemarketer Restriction Act.	Telemarketer Restriction Act summary
https://www.oag.ok.gov/contact	Oklahoma Attorney General contact page

Oregon Privacy Laws

Summary	Oregon privacy laws summary
-------------------------	-----------------------------

https://dfr.oregon.gov/business/Documents/4117.pdf	Oregon Identity Protection Act business guide
https://www.doj.state.or.us/oregon-department-of-justice/contact-us/	Oregon Attorney General contact page
https://www.doj.state.or.us/consumer-protection/id-theft-data-breaches/data-breaches/	Oregon data breach summary

Pennsylvania Data Breach Law

https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/pennsylvania	Insureon data breach notification summary
https://www.attorneygeneral.gov/contact/	Pennsylvania Attorney General contact page

Rhode Island Data Breach Law

https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/rhode-island	Insureon data breach notification summary
Rhode Island AG	Rhode Island Attorney General contact page

South Carolina Data Breach Law

https://www.consumer.sc.gov/business-resources/laws/reporting-security-breach-businesses	South Carolina data breach notification guide
https://www.scag.gov/about-the-office/contact-us/	South Carolina Attorney General contact page

South Dakota Security Breach Law

https://consumer.sd.gov/fastfacts/securitybreach.aspx	South Dakota security breach guide
https://atg.sd.gov/Contact.aspx#gsc.tab=0	South Dakota Attorney General contact page

Tennessee Insurance Data Security Law

https://www.tn.gov/commerce/insurance/company-resources/cybersecurity.html	TN. Insurance Data Security Law guide
https://comptroller.tn.gov/office-functions/state-audit/resources/data-breach-online-submission.html	Tennessee data breach guide
https://comptroller.tn.gov/contact-us.html	Tennessee Comptroller contact
TN. Attorney General.	Tennessee Attorney General contact page

Texas Data Breach Law

https://www.texasattorneygeneral.gov/consumer-protection/data-breach-reporting	Texas data breach guide
https://www.texasattorneygeneral.gov/contact-us	Texas Attorney General contact page

Vermont Data Privacy and Consumer Protection Act

https://iapp.org/news/a/analysis-vermonts-data-broker-regulation/	IAPP's Vermont Data Broker Regulation article
https://ago.vermont.gov/privacy-data-security	Vermont's Privacy and Data Security page
https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/vermont	Insureon's Vermont data breach notification summary
https://ago.vermont.gov/contact	Vermont Attorney General contact page

Washington Data Privacy Laws

https://www.atg.wa.gov/identity-theft-and-privacy-guide-businesses	Identity theft and privacy guide for businesses
https://iapp.org/news/a/unpacking-washington-states-cluster-of-comprehensive-privacy-bills/	IAPP's summary of Washington's privacy laws
https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/washington	Insureon data breach notification summary
https://www.atg.wa.gov/contactus.aspx	Washington Attorney General contact page

West Virginia Data Breach Law

https://privacy.wv.gov/Pages/default.aspx	West Virginia's privacy page
https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/west-virginia	Insureon data breach notification summary
WV AG.	West Virginia Attorney General contact page

Wisconsin Data Privacy Laws

General Privacy Law	General privacy laws summary
WI Data Breach	Wisconsin data breach notification guide
https://www.doj.state.wi.us/ag/contact	Wisconsin Attorney General contact page

Wyoming Data Breach Law

https://buckleyfirm.com/blog/2022-03-16/wyoming-enacts-genetic-data-privacy-provisions	Wyoming Genetic Data Privacy Act summary
---	--

https://www.insureon.com/small-business-insurance/cyber-liability/data-breach-laws/wyoming	Insureon data breach notification summary
https://ag.wyo.gov/	Wyoming Attorney General contact page